

# Appendix B: Consultation Response Summaries

## Scoping Report Consultation Responses

Ref	Consultee	Consultation Question/ Section	Response summary	Response/Action
1	Christine Ash	2b	<ul style="list-style-type: none"> <li>Stated that Canterbury ring road should be made one way to ensure traffic moves gently.</li> </ul>	Comment noted. The comments made that refer to traffic management rather than the SA and will be noted by the Council and considered during the plan making process.
		5b	<ul style="list-style-type: none"> <li>Stated that farmland should be protected to feed people.</li> </ul>	Comment noted. The SA Framework includes a specific SA Sub-Objective (Sub-Objective 11.2) relating to avoiding unnecessary loss of best and most versatile agricultural land.
		6a	<ul style="list-style-type: none"> <li>Stated that too much focus has been on controlling rivers like Nailbourne to avoid flooding of properties. This has also affected local farmers who cannot graze livestock along rivers. Annual dredging should be carried out instead.</li> </ul>	Comment noted. The comments made that relate to the contents of the Council's new Local Plan, rather than the SA, will be noted by the Council and considered during the plan making process.
		8a	<ul style="list-style-type: none"> <li>Stated that consideration should be given to the impact of increased housing on water infrastructure.</li> </ul>	The SA Scoping Report references the need to consider the importance of water infrastructure in new development and the future baseline in Section 8 references water resource availability which may be affected by population increases. Objective 6 references the need to protect water resources.
		9a	<ul style="list-style-type: none"> <li>Stated that the Historic Environment should be protected for future generations.</li> </ul>	Comment noted. The SA Scoping Report highlights the need to protect the historic environment and the SA Framework includes a specific SA Objective (Objective 9) relating to the District's historic environment.
		10a	<ul style="list-style-type: none"> <li>Expressed concern that too much focus is placed on student lets and not to private dwellings left derelict which could make good homes if owners made to occupy them.</li> </ul>	Comment noted. The SA Scoping Report highlights the need to ensure that sufficient housing is supplied to meet all of the needs of the district and meet housing targets. Furthermore, the SA Framework includes a specific SA Objective (Objective 10) regarding the supply of high-quality homes, which cater for identified needs.
		11b	<ul style="list-style-type: none"> <li>Stated that villages need encouragement to keep the economy going.</li> </ul>	Comment noted. The SA Framework includes a specific SA Objective (Objective 12) relating to the achievement of a strong and sustainable economy, and revitalisation of town, local and rural centres.
		12a	<ul style="list-style-type: none"> <li>Supported public transport for school children in rural areas.</li> </ul>	Comment noted. The SA Framework includes a specific SA Objective (Objective 13) that promotes sustainable transport.

2	Patricia Papa	2a	<ul style="list-style-type: none"> <li>Questioned whether there is a way of projecting air quality, taking account of housing currently being built or going to be built in the upcoming months.</li> </ul>	The SA Scoping Report relates to the Local Plan review and includes a SA Objective on air quality. Current development is subject to existing planning policy.
		3b	<ul style="list-style-type: none"> <li>Questioned whether the current water availability is sufficient for all planned housing in the event of a shortage of rain.</li> </ul>	Comment noted. The SA Scoping Report Section 8 (Key Sustainability Issues) acknowledges the need to ensure that there is a sufficient supply of water and the need to manage and protect water resources. The SA Framework includes a specific Sub-Objective (Sub-Objective 6.3) relating to the promotion of sustainable and efficient use of water resources.
		4b	<ul style="list-style-type: none"> <li>Considered that it was too late to consider the extension to the Wincheap park and ride as affecting biodiversity of the marsh area and that these issues should already be considered in the planning applications.</li> </ul>	Comment noted. This is a matter for the Local Plan review to address.
		6b	<ul style="list-style-type: none"> <li>Stated that water supply and arrangements for wastewater and sewage must be in place when new housing developments are approved and that this must be done with advice from the Water authorities in the area.</li> </ul>	Comment noted. Broader infrastructure requirements are a matter for the Local Plan whilst the development process must address specifics at the point of planning application consideration.
		7b	<ul style="list-style-type: none"> <li>Considered that the Council would need to give greater consideration to planning for waste at the end of Serco's contract.</li> <li>Stated that in order to continue to give the current service to all the new developments, there will need to be extra vehicles and employees.</li> </ul>	Comment noted. The comments made that relate to the waste strategy, rather than the SA, will be noted by the Council and considered during the plan making process.
		8b	<ul style="list-style-type: none"> <li>Stated that a third major hospital was necessary in order to maintain the health of the growing population.</li> </ul>	Comment noted. Infrastructure requirements and need will inform development within the Local Plan review. The comment will be considered during preparation of the Plan.
		10b	<ul style="list-style-type: none"> <li>Considered that low paid workers and people who need to be housed by the council will be unable to pay for 'social housing' as it will continue to be charged at the private rent level.</li> </ul>	Comment noted. The comments do not relate to the SA but will be noted by the Council and considered during the plan making process.
		12b	<ul style="list-style-type: none"> <li>Considered that increasing the number and size of lorries travelling on the A28 through and around the city is a sustainability problem and that using link roads from Sturry Hill and from Hersden onto the Sturry Road will do nothing to solve these problems.</li> </ul>	Comment noted. The SA Scoping Report Section 14 recognises the need to encourage investment in transport infrastructure to increase choice and reduce congestion and that investment is taking place on the A28. However, the specific investment measures, and efficacy of measures, are determined through transport planning measures not the SA which is to establish the likely significant effects of the Local Plan.
3	Martin Vye	12a	<ul style="list-style-type: none"> <li>Considered that the list of key sustainability issues for transport was appropriate.</li> <li>Stated that there is a disconnect between the picture of transport in Canterbury now and the urgency of the need to effect change which is articulated in the issues.</li> <li>Highlighted that the figures for home to work journeys are from 2011</li> </ul>	Comments noted. The figures for home to work journeys are from the ONS Census data (2011 Census) as this is currently the most up to date version of this data until the next census takes place in 2021. Evidence from the DfT

			<ul style="list-style-type: none"> <li>• Stated that the picture presented was not reflective of congestion on the A28, in particular around the ring road and particularly at peak-times and referred to statements made in the KCC-commissioned review by SWECO that: 16% growth in traffic is estimated in the area between 2016 and 2031; the network is very close to capacity already and that 'doing nothing is not an option'.</li> <li>• Highlighted that between St Peter's roundabout and the Tourtel Road upper roundabout there is no cycle-friendly crossing. Highlighted that cycling along the ring-road is hazardous to cyclists.</li> <li>• Stated that if mode shift for people commuting to work is to be achieved then cycling to work, either into the city centre, or across the urban area, needs to be promoted effectively, noting that there was an emphasis in analyses of transport problems in Canterbury on journeys into the city centre, however many people travel from one side of the urban area to the other.</li> <li>• Highlighted that in addition to workplaces, peak time destinations include schools and the East and West railway stations and that mode shift to buses should be a priority for the latter.</li> <li>• Highlighted that the 'Potential future baseline, without LP' section states 'certain improvements and key infrastructure not able to be built because funding through section 106 agreements would be difficult and often impossible.' but that most of the large developments which will contribute to the large growth in traffic on the network have already been permitted and section 106 agreed, so it is difficult to see how a new Local Plan would generate required funding from this source.</li> <li>• Considered that it would be useful to have a clear statement that the Local Transport Strategy, which helps to underpin the Local Plan, will be reviewed at the same time.</li> <li>• Suggested that given the declaration of a Climate Emergency by the City Council, the fact that transport is the biggest source of carbon emissions in Canterbury should be noted and that the Transport Strategy and Local Plan should have carbon neutrality as an overarching aim.</li> </ul>	<p>shows that traffic flows along the A28 (and other arterial roads) has been broadly static since 2000. The Local Plan review will take into account capacity evidence during preparation.</p> <p>The key sustainability issues in Section 14 recognise the need to reduce congestion and support walking and cycling. The SA Framework includes an objective on travel and transport (Objective 13).</p> <p>The Local Plan review will consider the Transport Strategy, prepared jointly with Kent County Council. The review of plans and programmes includes this document.</p>
4	Brian Moore	1	<p>Stated that:</p> <ul style="list-style-type: none"> <li>• Population growth should be reduced to national levels by resisting further expansion of housing development.</li> <li>• Housing development not on brownfield sites should be resisted.</li> <li>• Housing developments that do not incorporate solar panels, wind generator and grey water re-use facilities should be resisted; and, land-based solar PV developments should be resisted by insisting on domestic or commercial roof installations on all new buildings.</li> </ul>	<p>Comment noted. The comments made that relate to the contents of the Council's new Local Plan, rather than the SA, will be noted by the Council and considered during the plan making process. However, the SA Framework supports the use of previously developed land (Objective 11) and supports the minimisation of greenhouse gas emissions and use of renewables (Objective 2).</p>
		2b/3b/10b	<ul style="list-style-type: none"> <li>• Stated that expansion of housing developments should be resisted to thereby limit expansion of private motor vehicle use.</li> <li>• Considered that expansion of house-building, as currently practised, is unsustainable and that there should be a presumption against planning applications that do not include domestic electricity generation systems and that do not include water saving or recycling facilities.</li> <li>• Suggested that measures of sustainability of new housing should include evidence of increasing use of domestic energy generation and water recycling.</li> </ul>	<p>Comment noted. The comments made that relate to the contents of the Council's new Local Plan and will be noted by the Council and considered during the plan making process. The SA Framework supports the minimisation of greenhouse gas emissions and use of renewables (Objective 2) and efficient use of water resources (Objective 6).</p>
		7b	<ul style="list-style-type: none"> <li>• Stated that recycling facilities should be expanded to include expanded polystyrene recycling</li> </ul>	<p>This is not a matter for the SA to address.</p>
		8b	<ul style="list-style-type: none"> <li>• Stated that in order to maintain the health of an expanded population, hospital facilities would need to be expanded.</li> </ul>	<p>Comment noted. Infrastructure requirements and need will inform development within the Local Plan review. The</p>

				comment will be considered during preparation of the Plan.
		11b	<ul style="list-style-type: none"> <li>Stated that further expansion of tertiary education should be resisted as it already skews the Canterbury demographic.</li> </ul>	Comment noted. The new Local Plan will consider the importance of tertiary education to the City and how to plan for its needs.
		12b	<p>Stated that:</p> <ol style="list-style-type: none"> <li>the cycle network is inadequate and poorly connected;</li> <li>routes on country lanes are dangerous because of speeding traffic on narrow roads;</li> <li>measures for improvement of city centre and rural routes need to be developed; and</li> <li>the proposed housing development alongside the A28 at Thanington must connect with the cycle route from Chartham to Canterbury</li> </ol>	Comment noted. The comments relate to the contents of the new Local Plan and will be noted by the Council and considered during the plan making process. The SA supports promotion of the cycle network (Objective 13) as a means of supporting sustainable travel.
		13	<ul style="list-style-type: none"> <li>Considered that Sub-Objective 2.2 regarding standards of energy efficiency in new builds should have more indicators than "fuel consumption" and that indicators should include numbers of new builds with energy generating capacity.</li> </ul>	Agreed in part. The SA process can refine monitoring measures up to the point of adoption and they are subject to further iteration during the SA process. " <u>Number of new developments with energy generation capacity</u> " has been included as an indicator under SA Sub-Objective 2.3 subject to further appropriate mechanisms to monitor this as this Sub Objective directly refers to renewable usage. However, it is recognised that not all renewable energy installations will require planning permission.
		13	<ul style="list-style-type: none"> <li>Considered that sub-objective 2.3 supporting the use of renewable energies should not include planning applications for renewable sites as an indicator, as these consume land in a non-sustainable way and that the indicator should instead be related to the numbers of new builds with energy generating capacity.</li> </ul>	Disagreed. The inclusion of "Planning applications for renewable energies" as an indicator for Sub-Objective 2.3 is considered appropriate and this type of development, if directed to appropriate sites, is sustainable. More broadly, the effects would be assessed through the planning application process.
		13	<ul style="list-style-type: none"> <li>Considered that sub-objective 6.3 relating to sustainable use of water in new builds needs more specific indicators than numbers of "sustainable drainage systems" and asked what this meant.</li> </ul>	Disagreed. The reference is specifically to Sustainable Drainage Systems (SuDS) which are used to manage surface run off of developments sustainably. The proposed indicator is proportionate to the sub-objective.
		15	<ul style="list-style-type: none"> <li>Advised that population growth of the district needs to be reversed as growth that is higher than the national average is not sustainable.</li> </ul>	Comment noted. The new Local Plan preparation will consider the appropriate housing requirement for the District. This will be appraised through the SA process.
5	Canterbury Green Party (Geoff Meaden)	1	<ul style="list-style-type: none"> <li>Advised that there is an emerging Draft Transport Strategy for the South East, currently being consulted on which might need including in the review of plans and programmes.</li> <li>Considered that a 'consultative report' providing evidence of what residents of the district want their city to be was missing from the documentation and made reference to a document titled "Vision for Canterbury: Towards 2030" produced for the Canterbury Society which was compiled from questioning of local residents with the aim to complement the Council's planning for our city.</li> </ul>	<p>Agreed in part. The Draft Transport Strategy for the South East has been added to the review of plans and programmes.</p> <p>The comments relating to consultation will be considered during preparation of the Local Plan. The SA Report, which</p>

		<ul style="list-style-type: none"> <li>Stated that it appears to many people that City Council intentions for Canterbury District are based on top down decisions, that there was little evidence that the Council had made efforts to find out the perspective of residents and that there were a number of potential features or facets of a District that the Council are taking for granted as being needed by Canterbury.</li> </ul>	<p>supports the Local Plan, requires consultation on its findings in line with the 2004 Regulations.</p>
	2a	<ul style="list-style-type: none"> <li>Advised that air pollution data currently being compiled by Professor Stephen Peckham (University of Kent) would enhance the data currently held by the Council.</li> </ul>	<p>The SA Report will rely on robust, verified evidence on air quality such as that contained within the 2019 Air Quality Annual Status Report (ASR) (and any future publications) to determine likely significant effects on achievement of SA Objective 1. No change required; although any additional data such as that referenced by the submission will be reviewed when SA is undertaken of the iterations of the draft Local Plan, to ensure the plan is based on up-to-date evidence.</p>
	2b	<ul style="list-style-type: none"> <li>Considered that Old and New Dover Roads, St Dunstons Road, St Stephen's Road and Broad Oak Road were likely to be traffic hot spots once the proposed housing developments are initiated and that these would likely need to actively be monitored, in addition to the monitoring on the A2, A28 and A299.</li> <li>Advised that the Council may need to contact local health authorities to see if they are noticing health related problems emerging or increasing relating to air quality.</li> </ul>	<p>Comment noted. The monitoring locations are outside the scope of the SA, which is a process to determine likely significant effects. However, the SA supports reduction of air pollution and the improvement of air quality (Objective 1).</p>
	3b	<ul style="list-style-type: none"> <li>Advised that the Council must closely monitor IPCC reports and that extrapolations made by Councils from information provided by Central Government on climate changes are not always sufficiently robust.</li> <li>Advised that the flooding situation from both coastal and river sources is of major importance.</li> <li>Stated that retrofitting suitable insulation for existing housing stock is imperative and this has not been mentioned under the 'sustainability issues' section.</li> <li>Advised the importance of constructing all new-build housing and other built structures to the highest energy efficiency levels.</li> </ul>	<p>Comments noted. IPCC reports will be monitored closely as part of the plan making process. The SA Scoping Report highlights the need to become as energy efficient as possible, whilst reducing overall energy consumption as a key sustainability issue, whilst the SA Framework includes a specific SA Objective (Objective 2) relating to the promotion of energy efficiency.</p>
	4a	<ul style="list-style-type: none"> <li>Considered that there are large amounts of additional data which could inform the baseline analysis but does not currently exist and must therefore be collected. Highlighted that for a number of local species there is little knowledge on present numbers or distributions, the extent of their decline or successfulness and that most of the data available is highly generalised.</li> <li>Advised that it is vital that biodiversity collapse is addressed, but also acknowledged that the resources for doing so are highly limited.</li> <li>Recommended that an alliance between the Council and conservation bodies that are able to organise groups of volunteers for data collection, in conjunction with mitigation processes, was needed.</li> </ul>	<p>Comments noted. The collection of additional data on specific species beyond that publicly available is outside the scope of the SA. The current baseline includes recognition of the range of designated sites across the District. The SA Scoping Report recognises the need to ensure that development does not negatively impact biodiversity, and conserve and enhance biodiversity and protected sites, whilst the SA Framework includes a specific Objective (Objective 3) relating to the conservation, connection and enhancement of biodiversity across the district.</p>
	4b	<ul style="list-style-type: none"> <li>Stated that there were a number of issues that should be addressed, including:</li> </ul>	<p>Comments noted. The comments made that relate to the broader steps that the Council may take, including some of which are relevant to the Council's new Local Plan,</p>

			<ol style="list-style-type: none"> <li>1. The council must undo ecosystem/habitat fragmentation (to prevent biodiversity collapse) by identifying where there are gaps and preventing future development on those sites, whilst at the same time giving the gaps legal status</li> <li>2. The Council must immediately cease to allow the clearance of woodland for housing developments.</li> <li>3. The lack of mention in para 6.15 about curbing the herbicides and insecticides used mainly by farmers, which have well catalogued detrimental effects on wildlife.</li> <li>4. Techniques that suburban gardeners can use in order to encourage wildlife.</li> <li>5. The need to identify specific sites where species are depleted and thus would benefit from attention, examples of this are work done by the Kentish Countryside projects, which should be expanded.</li> </ol>	<p>rather than the SA, will be noted by the Council and considered during the plan making process.</p> <p>The SA Scoping Report recognises the need to ensure that development does not negatively impact biodiversity, and conserve and enhance biodiversity and protected sites, whilst the SA Framework includes a specific Objective (Objective 3) relating to the conservation, connection and enhancement of biodiversity across the district.</p>
		5b	<ul style="list-style-type: none"> <li>• Highlighted that paragraph 7.7. of the Scoping Report seems to make an attempt at considering farming potential, but only seems to consider soil quality.</li> <li>• Suggested that there should also be some form of land classification based on rural land use, which could be in the form of mapping with classes of land such as woodland (deciduous, coniferous, mixed), permanent grazing, arable, horticulture, orchard, which would be an important consideration with future land planning.</li> </ul>	<p>The SA Scoping Report does not include reference to specific locations. The Local Plan preparation will consider such issues further. Section 7 of the Scoping Report contains evidence on agricultural land classification across the District which informs consideration of productive agricultural use. However, the name of this section has been revised to 'Landscape, land use and geology' to reflect that land use is also considered here. Objective 11 focuses on the sustainable use of land as well as soil quality.</p>
		5b	<ul style="list-style-type: none"> <li>• Highlighted that paragraph 7.9 of the Scoping Report states "The valley of the River Stour around Canterbury has been identified to protect the historic landscape of the city and the World Heritage site." However, the Council are proposing to build an extended Park &amp; Ride at Wincheap on part of this landscape. Stated that the proposal to expand parking for cars is not sustainable.</li> </ul>	<p>The comments made do not relate to the SA. The SA Scoping Report highlights the need to reduce private car use and reduce the number of cars on the road in general (SA Objective 12) and preserve, enhance and promote the historic environment (SA Objective 9).</p>
		6b	<ul style="list-style-type: none"> <li>• Suggested that increased consideration should be given to the use of "grey" water, given the diminishing availability of fresh water in the South East.</li> </ul>	<p>Comment noted. The SA Scoping report recognises the need to protect and manage water resources, whilst the SA Framework includes a specific SA Sub-Objective (Sub-Objective 6.3) relating to the promotion of sustainable and efficient use of water resources.</p>
		8b	<ul style="list-style-type: none"> <li>• Stated that the council needs to be adaptable, given that the demographics relating to housing/accommodation needs in the area are frequently changing, particularly regarding the type of accommodation required. In particular the demand for student rooms has been high up until recently. Advised that student type rooms must be adaptable to change into family or single person use by people with longer term stay intentions.</li> <li>• Stated that it is vital that the District can provide for Council type housing as well as a range of other affordable dwellings. Stated that previous Local Plans have been unsatisfactory in terms of making correct estimations of housing needs, and the Council has been particularly incorrect when estimating office needs or business/industrial site provision.</li> </ul>	<p>Housing need will be determined through the Local Plan process in accordance with the NPPF and PPG. However, the SA Scoping Report highlights the need to maximise the supply of appropriate, well designed, located and affordable housing to meet the needs of the District and meet housing targets. Furthermore, the SA Framework includes a specific SA Objective (Objective 10) regarding the supply of high-quality homes, which cater for identified needs.</p>

		10b	<ul style="list-style-type: none"> <li>Advised that the questionnaire was difficult to navigate.</li> </ul>	Comments on the questionnaire format are noted and will be considered when preparing future consultations.
		12a	<ul style="list-style-type: none"> <li>Advised that the City Council needs to investigate why other local authorities can provide better bus services than that provided in Canterbury and to local destinations in East Kent and that an example that should be inspected is the service provided on the Isle of Wight.</li> </ul>	This is not a matter for the SA. The key sustainability issues in Section 14 recognise the need to encourage sustainable transport through the promotion of public transport, as supported by SA Objective 13.
		12b	<ul style="list-style-type: none"> <li>Suggested that a "Modal Shift Traffic Manager" must be appointed to reduce traffic congestion through encouraging a modal shift, to resolve traffic flows in Canterbury.</li> <li>Suggested that more comprehensive and well-connected cycle routes must be laid out through the city centre to sustain and increase bicycle travel. Stated that action should be taken to make some of the little used public pavements along entry roads into the city dual use for both pedestrians and cyclists.</li> <li>Stated that action is needed to identify why use of the Park &amp; Ride sites is diminishing.</li> <li>Considered that it is irresponsible for Kent and Canterbury councils to site major developments in locations where traffic modelling has not been completed by a neutral authority. Highlighted that presently the Council relies on modelling carried out by developers, who find that their proposed developments will have negligible effect on traffic volumes, which is unacceptable, but has happened under the last Local Plan. Highlighted, that the Sweco report identified that traffic on the A28 ring road will increase by 16% during the present planning period.</li> <li>Stated that counts of cyclists or cycle usage need to be regularized as the present evidence base is fragmented and potentially incomplete, so there is little confidence that a realistic situation has been described in the scoping report.</li> </ul>	<p>Comment noted. The comments made that refer to traffic management, active transport routes, transport modelling and the reduction in the use of park and ride, rather than the SA and will be noted by the Council and considered during the plan making process.</p> <p>The baseline in Section 14 includes information on cycle routes and daily usage and is considered appropriate and proportionate. Encouraging sustainable transport through the promotion of walking and cycling routes and park and ride is considered a key sustainability issue for the City as supported by SA Objective 13.</p>
		13	<ul style="list-style-type: none"> <li>Considered that with regard to sub-objective 2.2. it is important that high standards of energy efficiency are achieved in all buildings and not just new developments.</li> <li>Considered that objective 8 should include something on providing householders with better information on what can or cannot be recycled.</li> <li>Considered that objective 14 needs to include something on the provision of better (more comprehensive) health provision and noted that while this is not directly a Council responsibility, additional GP, hospital and care home provision is spatially intensive and extensive and therefore land designations will need to be planned for.</li> </ul>	<p>Agreed in part. With regard to Sub-Objective 2.2, it is considered that Objective 2 effectively captures the need to improve energy efficiency in a general sense. This is a measurable indicator. Regarding Objective 8, the provision of such information is outside of the scope of the SA, which is a process to determine likely significant effects.</p> <p>Regarding Objective 14, it is considered that Sub-Objective 14.2 be revised to read "Support equal access and improvements to community <u>and health</u> infrastructure, <del>and services</del> <u>and facilities</u> to meet day-to-day needs."</p>
		14	<p>Suggested that there are a number of other indicators and sources of data that could be included, including:</p> <ul style="list-style-type: none"> <li>SA Objective 1. <ul style="list-style-type: none"> <li>There should be indicators on the concentrations of PM2.5's.</li> <li>Data being collected by Professor Stephen Peckham's work at the University of Kent.</li> </ul> </li> </ul>	With regards to air quality the baseline data gathered from Defra suggests that the current background concentrations for PM2.5 in the district are well below the 2020 annual mean Air Quality Standard objective for PM2.5. The monitoring indicators will be refined through the Local Plan preparation and SA process up to adoption of the Local Plan. Inclusion of a specific PM2.5 indicator



				will therefore be subject to further discussion through further iterations of the SA.  The SA Report will rely on robust, verified evidence on air quality such as that contained within the 2019 Air Quality Annual Status Report (ASR) (and any future updates) to determine likely significant effects on achievement of SA Objective 1. No change required; although any additional data such as that referenced by the submission will be reviewed when SA is undertaken of the iterations of the draft Local Plan, to ensure the plan is based on up-to-date evidence.
		14	<ul style="list-style-type: none"> <li>● SA Sub Objective 2.2                             <ul style="list-style-type: none"> <li>○ The use of thermal imaging equipment to measure the energy 'leakiness' of buildings.</li> <li>○ An indicator for the trend in the number of buildings that are becoming energy efficient or are remaining energy inefficient.</li> </ul> </li> </ul>	The SA process can refine monitoring measures up to the point of adoption and they are subject to further iteration during the SA process. At this stage it is not considered that the 'Number of existing buildings becoming energy efficient' is a viable indicator for the SA particularly given most efficiency measures can be undertaken without planning permission. This will be kept under review during preparation of the SA.
		14	<ul style="list-style-type: none"> <li>● SA Objective 3.                             <ul style="list-style-type: none"> <li>○ Indicators for the acreage of woodland in the District and the miles of hedgerows.</li> </ul> </li> <li>● The Council should encourage the practice planting of hedgerows to form boundaries rather than wood panel fencing.</li> </ul>	Agreed in part. " <u>Amount of ancient woodland in the district</u> " to be included as an indicator under SA Sub-Objective 3.3/3.4. However, the second comment is beyond the scope of the SA and is a matter that can potentially be considered by the Local Plan through policy interventions. This will be considered as part of plan preparation.
		14	<ul style="list-style-type: none"> <li>● SA Objective 5.                             <ul style="list-style-type: none"> <li>○ The inclusion of landscaping/planting in developments must be insisted upon and measured.</li> </ul> </li> </ul>	Comment noted. This is a matter to be considered in the preparation of the Local Plan.
		14	<ul style="list-style-type: none"> <li>● SA Objective 6.                             <ul style="list-style-type: none"> <li>○ There should be an indicator for run-off or leaching from farmland.</li> </ul> </li> </ul>	Comment noted. It is not considered that this is a measurable indicator. Changes to NVZ is considered to adequately cover such issues.
		14	<ul style="list-style-type: none"> <li>● SA Sub Objective 10.6.                             <ul style="list-style-type: none"> <li>○ Promotion of high quality design of new buildings assumes that a quality design statement exists. If this is so and sufficient enforcement of design standards is carried out, then an indicator would be the number of developments reaching or breaching these standards.</li> </ul> </li> </ul>	Should the Local Plan provide policy on design standards in new development an indicator may well be appropriate. Indicators are refined through the plan preparation and iterative SA process and are confirmed on plan adoption.
		14	<ul style="list-style-type: none"> <li>● SA Objective 12.                             <ul style="list-style-type: none"> <li>○ Data collected by Lisa Carlton at BID collects on shop occupancy, etc.</li> </ul> </li> </ul>	As noted above indicators are not finalised until plan adoption. The use of data collected by the BID will be considered in the process of developing the SA.



		14	<ul style="list-style-type: none"> <li>● SA Objective 13.                             <ul style="list-style-type: none"> <li>○ An indicator should include the number of car electric charging points (potentially both private and public).</li> <li>○ The use of buses should also be counted.</li> </ul> </li> </ul>	<p>Comments noted. The use of buses is measured effectively through existing data sources on modes of transport. It is therefore considered a broader indicator on “<u>Modes of transport used</u>” is appropriate.</p> <p>Should the Local Plan provide policy on EVCPs in new development an indicator may well be appropriate. Indicators are refined through the plan preparation and iterative SA process and are confirmed on plan adoption.</p>
		14	<ul style="list-style-type: none"> <li>● Objective 14 There are no indicators for health provided yet there are a vast number of statistics available for these.</li> </ul>	<p>Comments noted. Indicators are refined through the Local Plan preparation and SA process up until adoption of the Local Plan. Consideration will be given to appropriate indicators to cover health in subsequent SA Reports.</p>
6	Langton and Nackington Residents' Association (Clive Flisher)	3b	<ul style="list-style-type: none"> <li>● Stated that with regard to Paragraph 5.7 of the Scoping Report, it should be remembered that some industrial emissions have effectively been exported, especially to Asia/China, from where imported manufactured products are shipped at an environmental cost and that alternative local production could reduce global emissions. Highlighted that with regard to Paragraph 5.11 of the Scoping Report retention of large scale housing stock of lower energy efficiency (even with insulation upgrades etc) will contribute to long term inefficiencies.</li> </ul>	<p>Comments noted. The SA Framework contains a specific SA Objective (2) relating to the reduction of the causes and adverse impacts of climate change and the promotion of energy efficiency. However, it is noted that existing housing stock presents challenges to achieving greater energy efficiency, although the SA would encourage achievement of all measures that increase energy efficiency.</p>
		5b	<ul style="list-style-type: none"> <li>● Highlighted that agricultural land quality is dealt with at Paragraphs 7.7 and 7.8 of the Scoping Report but is not identified under Paragraph 7.13, and that without planning out use of the best and most versatile land, there is danger of repeating the errors of the current plan and building on high grade, productive and sustainable local food land. Considered that this should be identified in the baseline and as a Key Sustainability Issue. Acknowledged that this is covered in the SA Framework under Objective 11 but considered that it should be given greater emphasis.</li> </ul>	<p>Disagreed. It is not considered that it is appropriate to identify agricultural land under paragraph 7.13 as this paragraph relates to Regionally Important Geological / Geomorphological sites (RIGS). The SA Framework includes a specific SA Sub-Objective (Sub-Objective 11.2) relating to the avoiding unnecessary loss of best and most versatile agricultural land, which addresses this issue. No change required.</p>
		10a	<ul style="list-style-type: none"> <li>● Suggested that smaller parcels of existing developed land with potential for higher density development/ conversion when considered with adjoining parcels should be promoted as a "third way" in addition to Brownfield and Greenfield development. Including the 1930's and 1950's council housing in all 3 major urban areas.                             <ul style="list-style-type: none"> <li>○ they tend to have large gardens, thus developed to low density by current standards;</li> <li>○ the housing stock is varied in quality;</li> <li>○ both the Local Authority and investors own blocks, or are in a position to amalgamate blocks for redevelopment;</li> <li>○ recent history has shown that under-developed sites of similar housing are viable for private sector developers such schemes will become more viable as values move ahead of costs, and in the event of more restricted greenfield opportunities; and,</li> </ul> </li> </ul>	<p>Comment noted. The comments made relate to potential development strategies and are therefore not relevant to the SA which is a process to determine likely significant effects of the Plan. However, the comments will be noted by the Council and considered during the plan making process.</p> <p>However, the SA Scoping Report highlights the need to: direct development to previously developed and the most appropriate land; ensure that developments are built to appropriate densities and maximise land available without</p>

			<ul style="list-style-type: none"> <li>o these would be sustainable in terms of greenfield land retention and transport.</li> <li>• Stated that given the extent of these estates represents potentially massive sustainable redevelopment potential, provided that the Local Plan includes a policy that indicates the Authority will look favourably on such schemes. Suggested that in the past such opportunities may have been regarded as windfalls and now they should be regarded as part of the planning solution at an early stage. Suggested it is likely that redevelopment opportunities will arise first on the edges of estates, where values are higher.</li> </ul>	<p>over developing; and, ensure a high quality of design as key sustainability issues. Furthermore, the SA Framework includes an objective (SA Objective 11) relating to the promotion of the sustainable use of land including specific sub-objectives relating to the efficient use of previously developed land (Sub-Objective 11.1) and the encouragement of appropriate building densities within developments (Sub-Objective 11.3).</p>
		10b	<ul style="list-style-type: none"> <li>• Highlighted that paragraph 12.14. of the Scoping Report references a lack of building of care homes and suggested that this has been a function of a lack of funding in the Care sector and has little to do with planning.</li> </ul>	<p>Comment noted. The type and mix of housing is a matter for the Local Plan review to consider but as noted funding has a significant impact on effective delivery.</p>
7	John Yard	2b	<ul style="list-style-type: none"> <li>• Stated that the key factor in all future policy is that the Council has declared a Climate Emergency and is planning to become zero carbon by 2030 and that this will drive all council decisions for at least the next 10 years and that for this to happen the Council need to have a carbon reduction plan to show how zero carbon can be achieved by 2030. This should apply to the Council's own estate as well as the district as a whole.</li> </ul>	<p>Comment noted. The SA baseline has been revised to include reference to the Climate Emergency declared by the Council. The need to address climate change and ensure the reduction of CO<sub>2</sub> levels are highlighted as key sustainability issues within Section 5 of the SA Scoping Report as supported by SA Objective 2.</p>
		3a	<ul style="list-style-type: none"> <li>• Considered that more detailed analysis of traffic movements and emissions needs to be commissioned to inform the carbon reduction plan as transport is a key factor in CO<sub>2</sub> emissions.</li> </ul>	<p>Comment noted. A separate Carbon Reduction Plan does not fall within the scope of the Local Plan or the SA, however the need to reduce carbon emissions in the District and how the policies of the Local Plan can help to achieve said reductions will be considered as part of the Local Plan preparation.</p> <p>The SA Scoping Report acknowledges the need to reduce road (car and HGV) traffic and encourage sustainable transport in the order of the sustainable transport hierarchy and ensure the reduction of CO<sub>2</sub> as key sustainability issues as supported by Objectives 2 and 13 of the SA Framework.</p>
		3b/6a	<ul style="list-style-type: none"> <li>• Stated that it is important to ensure that mitigation measures and adaptation measures are not combined.</li> </ul>	<p>Comment noted. The SA Objective 2 Sub-Objectives make adequate separate references to specific measures to mitigate and adapt to climate change.</p>
		4b	<ul style="list-style-type: none"> <li>• Considered that biodiversity and habitat repair is an essential part of the plan.</li> </ul>	<p>Comment noted. This is a matter for the Local Plan review to address. The SA supports the conservation and enhancement of biodiversity/habitats through SA Objective 5.</p>
		7b	<ul style="list-style-type: none"> <li>• Suggested that a community anaerobic digestion plan to produce gas and compost is required.</li> <li>• Stated that all council waste vehicles should be electric or extra low emission vehicles.</li> </ul>	<p>Comment noted. The comments made that relate to the waste strategy, rather than the SA, will be noted by the Council and considered during the plan making process.</p>



		10b	<ul style="list-style-type: none"> <li>• Stated that all new houses built in the district by 2025 should be zero carbon in operation, should be constructed with materials of the lowest possible embedded energy and should be designed to be flexible in use to extend life span.</li> <li>• Considered that refurbishment should always be preferred over new building.</li> <li>• Stated that only brownfield sites should be used for new housing.</li> </ul>	<p>Comment noted. The comments made that relate to the contents of the Council's new Local Plan, rather than the SA, and will be noted by the Council and considered during the plan making process. However, the SA Framework supports the use of previously developed land (Objective 11) and supports the minimisation of greenhouse gas emissions and use of renewables (Objective 2).</p>
		12b	<ul style="list-style-type: none"> <li>• Stated that all vehicles using the roads within the district should be electric or very low emission by 2030 and that CCC urgently needs to set up a low emissions zone around the city centre.</li> </ul>	<p>This is not an issue for the SA to address. However, ensuring CO<sub>2</sub> levels continue to decrease, particularly by trying to reduce the amount of CO<sub>2</sub> from transport in particular on A roads is a considered key sustainability issue within the SA Scoping Report as supported by Objective 2 of the SA Framework.</p>
		13/14	<ul style="list-style-type: none"> <li>• Stated that all policies should be aimed at achieving zero carbon by 2030.</li> </ul>	<p>The comments made that relate to the policies of the Local Plan, rather than the SA, will be noted by the Council and considered during the plan making process.</p> <p>However, the need to ensure the reduction of CO<sub>2</sub> levels is highlighted as a key sustainability issue within Section 5 of the SA Scoping Report, as supported by Objective 2 of the SA Framework that will be used to appraise the sustainability of the Local Plan. A reference to the Climate Emergency has also been added.</p>
8	Neasa MacErlean	1	<ul style="list-style-type: none"> <li>• Suggested that the highest priority plan within chapter 3 and Appendix B of the Scoping Report should be a District Climate and Ecological Emergency Response Plan.</li> <li>• Stated that the District Climate and Ecological Emergency Response plan, and therefore the new Local Plan, must be guided by the Special Report on Global Warming of 1.5 °C (SR15) Summary for Policymakers published by the Intergovernmental Panel on Climate Change (IPCC) (2018) and Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) Global Assessment Summary for Policymakers (2019).</li> <li>• Highlighted that the UK Committee for Climate Change makes it clear that local government must play a leading role in policy and plans to address the climate emergency and should challenge national government by setting ambitious plans and standards and demanding funding support to implement them.</li> <li>• Highlighted that the UN guidance for policy makers in SR15 supersedes the older references in Appendix B of the Scoping Report.</li> <li>• Stated that where older reports are listed in Appendix B of the Scoping Report, there needs to be a clear reason for them to be included.</li> </ul>	<p>Currently there is not a District Climate and Ecological Emergency Response Plan in place for the district of Canterbury. However, a number of key plans, policies and programmes relating to climate change, adaptation and mitigation at the international and national level have been reviewed in Appendix B as part of the production of the SA Scoping Report and have helped to develop the SA Framework that the Local Plan Review will be assessed against.</p> <p>The Special Report on Global Warming of 1.5 °C (SR15) Summary for Policymakers published by the Intergovernmental Panel on Climate Change (IPCC) (2018) and Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) Global Assessment Summary for Policymakers (2019) have been</p>

			<ul style="list-style-type: none"> <li>Advised that historic carbon reduction targets which have now been superseded by the Canterbury City Council Climate Emergency net zero carbon emissions for 2030 target should not be included as this creates confusion.</li> </ul>	<p>reviewed and included in the review of plans and programmes. Superseded reports have been revised/removed where necessary.</p> <p>The relevant targets to reduce the Council’s own carbon emissions, as part of the Climate Emergency declaration, have been included in the relevant baseline (Section 5).</p>
		2a	<ul style="list-style-type: none"> <li>Stated that the baseline data should also include peak concentrations in addition to the daily average, using the data collected from the work of local residents’ groups.</li> <li>Suggested that the data collected by the work of Stephen Peckham should be included.</li> </ul>	<p>The SA Report will rely on robust, verified evidence on air quality such as that contained within the 2019 Air Quality Annual Status Report (ASR) (and any future updates) to determine likely significant effects on achievement of SA Objective 1. No change required; although any additional data such as that referenced by the submission will be reviewed when SA is undertaken of the iterations of the draft Local Plan, to ensure the plan is based on up-to-date evidence.</p>
		2b	<ul style="list-style-type: none"> <li>Highlighted that the future baseline section essentially says that air quality will get worse and not a great deal will be done to address it. Suggested that instead the Scoping Report should state that for sustainable public health, all AQMAs must be converted to Low Emission Zones with the utmost urgency within the Local Plan.</li> </ul>	<p>Section 4.4 presents the future baseline scenario of air quality in the district without a Local Plan in place. Without a Local Plan and relevant Local Plan policies in place to support a reduction in air pollution and improvements in air quality, it is anticipated that current trends would continue.</p>
		3a	<ul style="list-style-type: none"> <li>Suggested that additional datasets providing the postcode area level trends in electricity and gas usage should be included, advising the use of BEIS Sub-National Level Electricity and Gas Consumption Statistics.</li> <li>Stated that a focus on the postcode area within the district would allow greater transparency of the energy performance of each District area and allow the Local Plan to make more informed sustainability decisions about any development plans.</li> <li>Stated that the number of properties connected to the gas network must be reduced year on year with no new homes connected to the gas network from 2025 (with reference made to Committee for Climate Change guidance) and suggested that BEIS data on gas connections should be used to track year on year progress and inform the Local Plan.</li> <li>Suggested that as reducing the number of gas network connections is a key indicator of a reduction in gas consumption, made clear by the Committee for Climate Change as being necessary to achieve a net zero emissions future, the Local Plan should therefore include data and targets for this measure.</li> <li>Stated that it is important not to conflate mitigation with adaptation as these require different priorities, plans and policies, and that climate change mitigation and adaptation should therefore be separated out as independent sections of the assessment.</li> </ul>	<p>The SA Scoping Report includes data on the consumption at local authority level (Section 5). This is considered appropriate and proportionate to the Local Plan. The inclusion of postcode level data is not considered appropriate for the SA to determine the likely significant effects of policies and proposals.</p> <p>The need to address climate change, ensure that CO2 levels are reduced, promote sustainable forms of energy and become as energy efficient as possible are all recognised as key sustainability issues within the SA Scoping Report as supported by Objective 2 of the SA Framework. No changes are required.</p> <p>Other comments relate to the contents of the Local Plan including specific targets and how the effects of the Local Plan are monitored, rather than the SA, and will be considered by the council during the Plan making process.</p>

		3b	<ul style="list-style-type: none"> <li>Stated that consumption is a major component of the causes of climate change and is missing from the Climate Change section of the scoping report. Highlighted that consumption of goods (and associated emissions related to production, transport, use and disposal) is responsible for roughly a third of carbon emissions in the district and stated that the Local Plan must incorporate measures to facilitate the reduction of District consumption by unlocking barriers to sustainable living.</li> <li>Advised that the Office for National Statistics (ONS) provides data resources for consumption segmented by category and therefore suitable measures on the volume of consumption at District and sub-district should be included so that the impact of the Local Plan on patterns of consumption can be included.</li> </ul>	<p>The comments regarding consumption relate to issues that the Local Plan should address and how these can be monitored. These will be considered in preparation of the Local Plan. Section 5 includes baseline data on energy consumption. The SA Framework that will be used to assess the sustainability of the Local Plan, includes an objective (Objective 2) relating to the reduction of the causes of the adverse impacts of Climate Change. No changes are required.</p>
		4a	<ul style="list-style-type: none"> <li>Highlighted that the biodiversity section focuses on nature reserves and sites of special scientific interest, however, IPBES guidance for policy makers shows that there must be a whole system approach to biodiversity restoration and that all Local Planning must include regenerative action.</li> <li>Stated that the net gain in biodiversity through provision of wildlife connectivity on all future development needs to be a clear measure expressed in numerical terms, for example m<sup>2</sup>.</li> <li>Stated that Increasing green infrastructure and connectivity must be included in all proposed Local Plans as well as the importance of stopping habitat destruction through expansion and infill of urban district areas.</li> <li>Suggested that if suitable data sources do not already exist, Canterbury City Council should commission them.</li> <li>Stated that the targets and plans for Kent to increase biodiversity from Kent Nature Partnership and Kent County Council should be included as important data sources for the Local Plan.</li> </ul>	<p>Comments noted. The comments that relate to approaches and measures that the Local Plan should take with regard to biodiversity and how these can be monitored, rather than the SA will be noted by the Council and considered as part of the plan making process.</p> <p>However, the SA Scoping Report recognises the need to ensure that development does not negatively impact biodiversity, and that the Local Plan helps to conserve and enhance biodiversity and protected sites, whilst the SA Framework includes a specific Objective (Objective 3) relating to the conservation, connection and enhancement of biodiversity across the district.</p>
		4b	<ul style="list-style-type: none"> <li>Considered that the statements within the 'Key Sustainability Issues' section lack conviction and that all local developments must include measures to help the regeneration of biodiversity in an integrated approach. Stated that the statements imply a separation of people and biodiversity.</li> </ul>	<p>Comments noted. The SA Scoping Report recognises the need to ensure that development does not negatively impact biodiversity, and that the Local Plan helps to conserve and enhance biodiversity and protected sites, whilst the SA Framework includes a specific Objective (Objective 3) relating to the conservation, connection and enhancement of biodiversity across the district. No changes required.</p>
		7a	<ul style="list-style-type: none"> <li>Highlighted that although Paragraph 9.3 of the Scoping report mentions the reduction of waste going to landfill but the incineration of waste and associated emissions to the atmosphere is now a more significant issue with regard to the climate.</li> <li>Stated that the annual tonnage of emissions resulting from the transport and incineration of waste is a key measure that should be presented. Suggested that Canterbury City Council will hold the data on waste tonnage and the other data should be easily calculated.</li> </ul>	<p>Section 9 includes analysis of waste to landfill, electricity generation from waste, and that recycled/composted. This provides adequate baseline to determine how waste is treated in the District. The SA Scoping Report highlights the need to ensure that the waste hierarchy continues to be implemented so that reuse options continue to increase as the preferred option over final disposal of waste as a key sustainability issue, as well as the need to reduce the volume of waste produced by new</p>

				<p>development, change of uses or conversions. This is supported by Objective 8 of the SA Framework.</p> <p>The need to address climate change and ensure that CO<sub>2</sub> levels are reduced are also recognised as key sustainability issues within the SA Scoping Report, as supported by Objective 2 of the SA Framework. No changes required.</p>
		12a	<ul style="list-style-type: none"> <li>Highlighted that commuting to school and work is the largest source of transport activity in the district and is a significant cause of the congestion, air quality and greenhouse gas emissions problems.</li> <li>Suggested that an annual survey of residents regarding how they live, including how they travel to work and school is an important source of information to enable evidence-based planning and if this data source does not already exist, then it should be put in place.</li> </ul>	<p>The SA Scoping Report highlights the need to reduce the amount of people travelling to work by car and encouraging sustainable modes of transport in line with the sustainable transport hierarchy as key sustainability issues. The travel to work presented in the SA Scoping Report is based on the most up to date ONS Census data (2011 Census) and is currently the most up to date version of this data available, until the 2021 Census takes place.</p> <p>The collection of travel to work and school data through an annual survey of residents is not considered necessary, proportionate or practical for development of the Local Plan or for inclusion within the SA to monitor if significant effects are likely. No changes required.</p>
		12b	<ul style="list-style-type: none"> <li>Stated that the current Council Sustainability Strategy 2017 (2014-2031) is not fit for purpose, noting that the planned expenditure on road development and car parking is six times the total planned expenditure on sustainable transport solutions and the plan will fail to deliver air quality targets, District transport modal shift targets and fail to reduce emissions to meet UK national targets.</li> <li>Stated that the framework should acknowledge that the Canterbury City Council Transport Strategy 2017 needs reconsideration. Stated that absolute numbers of journeys and where available average distance should also be quoted as these are also significant in informing policy.</li> <li>Stated that the cycling strategy for Canterbury District needs a rethink if it is to achieve significant modal shift for journeys under 5 miles as per the transport strategy.</li> <li>Stated that paragraphs 14.2 – 14.4 of the Scoping Report regarding cycling conflate cycling for leisure and cycling as a mode of daily transport. Suggested that the rapid implementation of low-cost on road cycle lanes ubiquitously within the 5 mile radii of the district conurbations in conjunction with lower urban speed restrictions and culture-changing campaigns is a practical short-term solution.</li> </ul>	<p>Comment noted. A number of comments made that relate to the Local Plan and the Transport Strategy, rather than the SA.</p> <p>The key sustainability issues identify the need to encourage sustainable transport in the order of the sustainable transport hierarchy and to ensure that the provision of sustainable transport is in the appropriate location, quantity and standard to encourage modal shift as well encouragement of investment into transport infrastructure to increase choice and reduce congestion as supported by Objective 13 of the SA Framework.</p> <p>The baseline in Section 14 includes cycle routes and daily usage and is considered appropriate and proportionate. Encouraging sustainable transport through the promotion of walking and cycling routes and park and ride is considered a key sustainability issue for the City as supported by SA Objective 13.</p>

9	Sport England (Jo Edwards)	1	<ul style="list-style-type: none"> <li>The inclusion of Sport England’s own strategies and guidance in Appendix B of the Scoping Report was welcomed. Suggested that, although currently still being prepared, the Council’s Playing Pitch Strategy and Local Football Facilities Plan should be referenced in Appendix B of the Scoping Report.</li> </ul>	Support welcomed. The Local Football Facilities Plan has been added. the Councils Playing Pitch Strategy (which will form part of the Open Spaces Strategy) and Indoor Built Facilities Strategy will be included in the review of plans and programmes when drafts are available.
		8b	<ul style="list-style-type: none"> <li>Requested that bullet 2 of paragraph 10.17 of the Scoping Report should include acknowledgement that population growth will increase demand for sport and recreation facilities.</li> <li>Stated that a key sustainability issue will be to protect, provide and enhance both formal and informal opportunities for all to take part in sport and to be physically active.</li> </ul>	Agreed. The future baseline bullet point 2 has been amended to read: “An increase in population will place an increasing demand on services and, health facilities and <u>sport and recreation facilities.</u> ” Addition to the key sustainability issues of Section 10 to read: “ <u>Ensure that formal and informal opportunities for all to take part in sport and be physically active are protected, provided and enhanced.</u> ”
		12b	<ul style="list-style-type: none"> <li>Stated that walking as a form of transport should be recognised and have its own heading.</li> <li>Stated that key sustainability issues include wherever possible co-locating community facilities in walkable and well connected neighbourhoods</li> </ul>	Include: “ <u>Encourage the co-location of community facilities in walkable, well connected neighbourhoods, wherever possible.</u> ” as a key sustainability issue.
		13	<ul style="list-style-type: none"> <li>Stated that a sub objective related to promoting walking and cycling is required under the Transport section</li> </ul>	Sub-Objective 13.1 of the SA Framework promotes consistency with the sustainable transport hierarchy and improvements to support increased use of sustainable transport methods. The order of the sustainable transport hierarchy (as set out in Section 14 of the SA Scoping Report) is: 1. Walking, 2. Cycling, 3. Public transport (buses and trains), 4. Park and ride; and 5. Private car. Therefore, it is considered that Sub-Objective 13.1 already promotes the use of walking and cycling, as they are at the top of the hierarchy.
		14	<ul style="list-style-type: none"> <li>Considered that an indicator related to levels of walking is required</li> </ul>	Agreed that such an indicator would be beneficial in principle. However, it is not considered that there is monitoring data available to capture levels of walking in the District. No change required.
10	Sarah Deakin	1	<ul style="list-style-type: none"> <li>Suggested that the highest priority plan within chapter 3 and Appendix B of the Scoping Report should be a District Climate and Ecological Emergency Response Plan.</li> <li>Stated that the District Climate and Ecological Emergency Response plan, and therefore the new Local Plan, must be guided by the Special Report on Global Warming of 1.5 °C (SR15) Summary for Policymakers published by the Intergovernmental Panel on Climate Change (IPCC) (2018) and Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) Global Assessment Summary for Policymakers (2019).</li> <li>Highlighted that the UN guidance for policy makers in SR15 supersedes the older references in Appendix B of the Scoping Report.</li> </ul>	Currently there is not a District Climate and Ecological Emergency Response Plan in place for the district of Canterbury. However, a number of key plans, policies and programmes relating to climate change, adaptation and mitigation at the international and national level have been reviewed in Appendix B as part of the production of the SA Scoping Report and have helped to develop the SA Framework that the Local Plan Review will be assessed against.



			<ul style="list-style-type: none"> <li>Advised that where older reports are listed in Appendix B of the Scoping Report, there needs to be a clear reason for them to be included.</li> <li>Advised that historic carbon reduction targets which have now been superseded by the Canterbury City Council Climate Emergency net zero carbon emissions for 2030 target should not be included as this creates confusion.</li> </ul>	<p>The Special Report on Global Warming of 1.5 °C (SR15) Summary for Policymakers published by the Intergovernmental Panel on Climate Change (IPCC) (2018) and Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) Global Assessment Summary for Policymakers (2019) have been reviewed and included in the review of plans and programmes. Superseded reports have been revised/removed where necessary.</p> <p>The relevant targets to reduce the Council's own carbon emissions, as part of the Climate Emergency declaration, have been included in the baseline (Section 5).</p>
		1	Stated that the Public Health England Strategy 2020-2025 no 3 Creating Cleaner Air and the Kent Joint Strategic Needs Assessment (health indicators) for Kent should be included and advised that the health aspects of policy need to be included, as these are important outcomes of the Local Plan.	The Public Health England Strategy 2020-2025 no.3 Creating Cleaner Air and the Kent Joint Strategic Needs Assessment (Health Indicators) for Kent have been included in the review of plans, policies and programmes.
		2a	<ul style="list-style-type: none"> <li>Stated that whilst it is important to measure the concentration of air pollutants, it is key to measure how it affects health as this is the outcome, recommending that the number of respiratory-related hospital admission cases per 100 000 population also be measured as per the guidance in 'City planning and population health: a global challenge' article (Billie Giles-Corti et al., 2016).</li> </ul>	Agreed. Comments noted. Indicators are refined through the Local Plan preparation and SA process up until adoption of the Local Plan. Consideration will be given to appropriate indicators to cover health and air quality.
		2b	<ul style="list-style-type: none"> <li>Suggested that the baseline data should also include peak concentrations in addition to the daily average, using data collected by local residents groups and that the data collected by the work of Stephen Peckham should be included.</li> </ul>	The SA Report will rely on robust, verified evidence on air quality such as that contained within the 2019 Air Quality Annual Status Report (ASR) (and any future updates) to determine likely significant effects on achievement of SA Objective 1. No change required; although any additional data such as that referenced by the submission will be reviewed when SA is undertaken of the iterations of the draft Local Plan, to ensure the plan is based on up-to-date evidence.
		3a	<ul style="list-style-type: none"> <li>Suggested that measures for electricity and gas usage (BEIS Sub National Level Electricity and Gas consumption stats) should be used to inform the baseline analysis.</li> <li>Suggested that the number of properties using renewable energy should be used to inform the baseline analysis.</li> <li>Stated that no new homes should be connected to gas from 2025.</li> <li>Stated that mitigation and adaptation should be separate items.</li> <li>Suggested that targets should be set for at least 30GW of onshore wind and 40GW of solar by 2030 as per guidance in Greenpeace's 'How Government Should Address The Climate Emergency' document</li> </ul>	<p>The SA Scoping Report includes data on the consumption at local authority level (Section 5). This is considered appropriate and proportionate to the Local Plan.</p> <p>The need to address climate change, ensure that CO2 levels are reduced, promote sustainable forms of energy and become as energy efficient as possible are all recognised as key sustainability issues within the SA Scoping Report as supported by Objective 2 of the SA Framework. No changes are required.</p>



				Other comments relate to the contents of the Local Plan including specific targets and how the effects of the Local Plan are monitored, rather than the SA, and will be considered by the council during the Plan making process.
		4a	<ul style="list-style-type: none"> <li>Stated that the percentage of urban land allocated to open or green space is a measure that could be used to monitor habitat loss as per the guidance set out in the Kent Joint Strategic Needs Assessment (JSNA) Exceptions Report 2018/19</li> <li>Suggested that the targets and plans for Kent to increase biodiversity from Kent Nature Partnership and Kent County Council should be included as important data sources for the Local Plan.</li> </ul>	Comments noted. The comments that relate to monitoring of habitat loss and sources of data for the Local Plan, rather than the SA will be noted by the council and considered as part of the plan making process.
		4b	<ul style="list-style-type: none"> <li>Stated that all local developments must include measures that assist the regeneration of biodiversity in an integrated approach.</li> <li>Stated that the statements in the 'Key Sustainability Issues' section imply a separation of people and biodiversity.</li> </ul>	Comments noted. The SA Scoping Report recognises the need to ensure that development does not negatively impact biodiversity, and that the Local Plan helps to conserve and enhance biodiversity and protected sites, whilst the SA Framework includes a specific Objective (Objective 3) relating to the conservation, connection and enhancement of biodiversity across the district. No changes required.
		4b	<ul style="list-style-type: none"> <li>Suggested that the concept of sustainable farming needs to be considered. Suggested that targets should be introduced for the significant reduction of meat and dairy consumption, in line with scientific advice as per guidance set out in Greenpeace's 'How Government Should Address The Climate Emergency' document.</li> </ul>	The implementation of sustainable farming is beyond the scope of the SA. The SA does consider climate change in Section 5 and SA Objective 2.
		6a	<ul style="list-style-type: none"> <li>Stated that data on upper limits on water extraction and supply for the district should inform the baseline analysis.</li> <li>Noted that the sustainability issues related to the long term contamination of the water system with chemicals from farming and other synthetic chemicals was discussed in the scoping report but highlighted that the issue is more significant than nitrates. Suggested that data regarding this would be helpful, for example long term trends in contaminant levels by the water pumping station, which is available from South East Water.</li> <li>Stated that there is no discussion regarding the reduction of extracted potable water consumption through localised rainwater collection and/or water re-use.</li> <li>Highlighted that the main measure cited for water reduction is through SUDS, which is more about how rainwater drains from developments.</li> </ul>	<p>The comments made regarding specific measures for reducing water consumption, rather than the SA will be considered by the Council during the plan making process. With regards to contamination, the baseline covers the Drinking Water Safeguard Zone and the need to manage this area to prevent contamination which is considered appropriate and proportionate.</p> <p>The monitoring indicators will be refined through the Local Plan preparation and SA process up to adoption of the Local Plan. The SA Framework includes Sub-Objective 6.3 "Promote the sustainable and efficient use of water resources". Addition of an indicator for "<u>per capita consumption of water</u>" using Southern Water and South East Water data would support assessment of efficiency measures and has been included subject to further discussion through further iterations of the SA.</p>



		6b	<ul style="list-style-type: none"> <li>Highlighted that there is no mention in the Scoping Report regarding how to encourage households to use less water and collect their own water.</li> </ul>	<p>The comments do not relate to the SA but will be noted by the Council and considered during the plan making process. The SA Scoping Report key sustainability issues acknowledges the need to ensure that there is a sufficient supply of water and the need to manage and protect water resources. The SA Framework includes a specific Sub-Objective (Sub-Objective 6.3) relating to the promotion of sustainable and efficient use of water resources.</p>
		7a	<ul style="list-style-type: none"> <li>Highlighted that although Paragraph 9.3 of the Scoping report mentions the reduction of waste going to landfill, the incineration of waste and associated emissions to the atmosphere is now a more significant issue with regard to the climate.</li> <li>Stated that the annual tonnage of emissions resulting from the transport and incineration of waste is a key measure that should be presented. Suggested that Canterbury City Council will hold the data on waste tonnage and the other data should be easily calculated.</li> </ul>	<p>Section 9 includes analysis of waste to landfill, electricity generation from waste, and that recycled/composted. This provides adequate baseline to determine how waste is treated in the District. The SA Scoping Report highlights the need to ensure that the waste hierarchy continues to be implemented so that reuse options continue to increase as the preferred option over final disposal of waste as a key sustainability issue, as well as the need to reduce the volume of waste produced by new development, change of uses or conversions. This is supported by Objective 8 of the SA Framework.</p> <p>The need to address climate change and ensure that CO2 levels are reduced are also recognised as key sustainability issues within the SA Scoping Report, as supported by Objective 2 of the SA Framework. No changes required.</p>
		7b	<ul style="list-style-type: none"> <li>Stated that biodegradable waste going to landfill should be progressively reduced and banned by 2025 as per Greenpeace’s ‘How Government Should Address the Climate Emergency’ document.</li> <li>Stated that treated waste food should be allowed to be used for animal feed in agroecological pig farms as per Greenpeace’s ‘How Government Should Address the Climate Emergency’ document.</li> <li>Suggested that data on waste reduction and data on how much compostable waste that is not composted should be used</li> <li>Stated that waste from construction needs to consider using environmentally friendly resources so that less waste will need to be dealt with, reduce use of materials, reusing materials (such as bricks), with recycling and burning, and burying being the very last resort.</li> <li>Suggested that data on how much construction materials goes to landfill and what types of materials should be used.</li> </ul>	<p>Comment noted. The comments made that relate to the waste strategy, rather than the SA, will be noted by the Council and considered during the plan making process. The data suggested for use is considered to be too specific and not proportionate to be included in the SA. Additionally, it is not considered that compostable waste that is not composted is measurable. Section 9 includes analysis of data that is recycled/composted. The SA Scoping Report highlights the need to ensure that the waste hierarchy continues to be implemented so that reuse options (recycling, composting and electricity) continue to increase as the preferred option over final disposal of waste as a key sustainability issue, as well as the need to reduce the volume of waste produced by new development, change of uses or conversions. This is</p>

				supported by SA Objective 8. This also applies to consideration of construction waste. No changes required.
		8a	<ul style="list-style-type: none"> <li>• Stated that further detail was required about the health issues in Canterbury and the District.</li> <li>• Suggested the use of the Kent &amp; Medway Joint Strategic Needs Assessment targets/indicators as per the Kent Joint Strategic Needs Assessment (JSNA) Exceptions Report 2018/19 and the use of the public health profiles available from the Public Health England website to obtain the data for those indicators for Canterbury District.</li> <li>• Stated that it was important to obtain a more accurate picture of health in Canterbury as this will help the council know where to place resources more sustainably.</li> </ul>	<p>Agreed that enhanced references are required under Section 10 (Population and Human Health) including Public Health England data on health in the City in the 'Local Authority Health Profile' which has been included in the updated baseline. Reference has also been included to the JSNA and the JSNA has been added to plans, programmes review.</p> <p>However, the SA Framework already includes an objective on promoting health (SA Objective 14) so likely significant effects on health can be identified through the SA and no changes are required to the SA Framework.</p>
		10a	<ul style="list-style-type: none"> <li>• Suggested that the number of empty dwellings and second homes needs to be recorded and presented as part of the decision-making data for the district.</li> <li>• Suggested the use of the following urban planning and design codes from the article titled 'City planning and population health: a global challenge' (Billie Giles-Corti et al., 2016) for use as indicators: <ul style="list-style-type: none"> <li>○ Urban planning and design codes that require a balanced ratio of jobs to housing (0.8 - 1.2)</li> <li>○ Urban design codes create pedestrian-friendly and cycling-friendly neighbourhoods, requiring highly connected street networks (e.g. ped-sheds <math>\geq 0.6</math> within 0.8–1.2 km); pedestrian and cycling infrastructure provision; public open space; lot layouts that maximise natural surveillance</li> <li>○ Urban design codes require minimum and maximum context-specific housing densities, including higher density development around activity centres and transport hubs</li> <li>○ Urban design codes require frequent service public transport to be within 400–800 m of residential walkable catchments</li> <li>○ Urban design codes require a diverse mix of housing types and local destinations needed for daily living</li> <li>○ Urban design codes incorporate crime prevention through urban design principles, manage traffic exposure and establish urban greening provisions</li> </ul> </li> </ul>	<p>Agreed. Section 12 of the SA Scoping Report sets out an overview of the housing baseline including the percentages of home ownership, shared ownership, social rented, private rented and living rent free and affordable housing completions. It is considered that this provides evidence about the mix of housing types in the district that is proportionate for the SA. However, it is considered that empty dwellings and second homes would be useful baseline information and has been added, as relevant to effective re-use of existing underutilised housing stock. The use of specific design codes is something that will be considered as part of the development of the Local Plan, rather than the SA which will appraise the sustainability of the Local Plan.</p>
		10b	<ul style="list-style-type: none"> <li>• Stated that there should be a clear plan to prioritise housing to reduce the housing needs register to zero and that this should be clearly expressed in the Housing Key Sustainability Issues section of the Scoping Report.</li> <li>• Stated that housing stock needs to be zero carbon by 2045, by implementing energy efficiency, removing all gas boilers, installing renewable energy sources as per guidance in Greenpeace's 'How Government Should Address The Climate Emergency' document.</li> </ul>	<p>The key sustainability issues identify the need to provide sufficient housing to meet the needs of the District. The Local Plan process will determine those housing needs and a requirement to meet them. The SA will appraise the preferred option and reasonable alternatives.</p> <p>The SA Framework includes a specific Objective (10) to ensure supply of high quality homes, which cater for identified needs as well as a specific Objective (2) relating</p>

				to the reduction of the causes and adverse impacts of climate change and promotion of energy efficiency.
		12a	<ul style="list-style-type: none"> <li>Stated that the following data/indicators from the article titled 'City planning and population health: a global challenge' (Billie Giles-Corti et al., 2016) are vital to show accountability and transparency of transport in Canterbury and should be included in the baseline:                             <ol style="list-style-type: none"> <li>Percentage of total local government transport expenditure in a given financial year spent on pedestrian infrastructure, cycling infrastructure, public transport, and road infrastructure.</li> <li>Percentage population living within 400–800 m of high-frequency public transport</li> <li>Percentage of population with employment within ≤30 min of their home by walking, cycling, or public transport</li> <li>Ratio of roads (km) to footpaths (km) and designated cycle lanes (km)</li> <li>Dwellings or area within 1-2 km of activity centres and public transport hubs, and in urban fringe developments</li> <li>Percentage of population living within 400 m of a bus stop and 800 m of a rail stop</li> <li>Percentage (urban) land area allocated to destinations required for daily living</li> <li>Proportion of total and commuting trips made by walking, cycling, public transport, and private motor vehicle</li> <li>Road death and injury rate expressed as the number of cases per 100 000 population; proportion of road injuries and deaths involving pedestrians and cyclists</li> <li>Prevalence of insufficient physical activity, expressed as a percentage of adults, adolescents, and children who are physically inactive</li> <li>Numbers of School travel plans and annual reviews (KCC School travel officer will have this data on jambusters)</li> </ol> </li> </ul>	<p>The Transport baseline in Section 14 is considered proportionate to inform the assessment of likely significant effects, which is the intention of the SA. It covers cycling, public transport usage, car ownership, roads and travel to work patterns.</p> <p>However, the baseline information (from Section 14) has been amended to include data on the number of people killed or seriously injured on the roads.</p> <p>Section 10 already includes analysis of residents' ability to undertake day-to-day activities.</p> <p>No further changes required.</p>
		12b	<ul style="list-style-type: none"> <li>Stated that absolute numbers of journeys and where available average distance should be quoted.</li> <li>Suggested that consideration should be given to the recruitment of a 'sustainable travel officer' to monitor and initiate projects to enable action on the indicators.</li> </ul>	<p>The suggested data is not considered to be proportionate to the SA.</p> <p>The comments relating to specific job roles do not relate to the SA or Local Plan process.</p>
		13	<ul style="list-style-type: none"> <li>Stated that the objectives and sub-objectives are too vague and non-specific.</li> <li>Stated that there should be numbers/figures/percentages to show what changes have actually happened, with a traffic light style indication of progress.</li> <li>Referred to comments presented under other questions which contain recommendations with regard to amendments required to the objectives or sub objectives to ensure the proposed SA Framework reflects the baseline analysis.</li> <li>Suggested that the indicators should be prioritised depending upon importance to health and happiness of local people.</li> </ul>	<p>The SA Objectives and sub-objectives are proportionate to appraise the sustainability of the Local Plan. The Objectives are not hierarchical and each are of equal importance to achieving sustainable outcomes that meet social, environmental and economic objectives.</p>
11	Heather Stennett	1	<ul style="list-style-type: none"> <li>Stated that the lack of guidelines and consideration of the impacts of temporary accommodation for seasonal agricultural workers is an omission that needs to be addressed.</li> <li>Stated that although there are some Permitted Development Rights for landowners, the impact on the residential community needs to be considered.</li> </ul>	<p>Comments noted. The comments regarding temporary accommodation for seasonal agricultural workers relate to the contents of the Local Plan rather than the SA and as</p>

			<ul style="list-style-type: none"> <li>Stated that there needs to be clear guidelines about how and by whom the sites will be monitored to ensure that the accommodation is not sub-standard and is fully compliant with Health and Safety and Fire regulations, with clearly defined scrutiny by Canterbury City Council as the planning authority.</li> </ul>	such will be considered by the Council as the Local Plan Review is developed.
		10b	<ul style="list-style-type: none"> <li>Stated that affordable housing is essential and that current planning applications appear to have too much 'wriggle room' and do not provide the percentage of affordable housing which is required under the current Local Plan.</li> </ul>	Comment noted. The comment relates to the effectiveness of the current Local Plan with regard to the delivery of affordable housing and as such will be considered as part of the development of the Local Plan review. However, the provision of sufficient housing (including affordable housing) that supports the needs of the district and meets housing targets is highlighted as a key sustainability issue within the SA Scoping Report and is supported by SA Objective 10 and in particular by Sub-Objectives 10.1 and 10.2 of the SA Framework.
		12b	<ul style="list-style-type: none"> <li>Highlighted that many large scale developments are not and will not be directly served by a bus route.</li> <li>Stated that the planning process should involve dialogue between the developer, bus company and the planning authority and that current applications lack this requirement.</li> </ul>	<p>The comments relate to appropriate locating of bus routes and making a dialogue between developers, bus companies and the planning authority a requirement of the planning process and are therefore related to the content of the Local Plan itself rather than the SA, and therefore will be considered as part of the development of the Local Plan review.</p> <p>However, ensuring that the provision of sustainable transport is appropriate in location, quantity and standard, to encourage mode shift is a key sustainability issue in the SA Scoping Report, while the SA Framework supports the promotion and encouragement of sustainable transport methods (Objective 13) and includes a specific Sub-Objective (13.4) for encouraging investment to improved transport infrastructure.</p>
		12 (Housing)	<ul style="list-style-type: none"> <li>Highlighted that there was no mention in the Scoping Report of temporary accommodation for seasonal agricultural workers. Noted that the current Local Plan does not reference this type of accommodation, however recommended that there needs to be a set of guidelines to be followed in the future and that this should be considered and included in the next Local Plan.</li> </ul>	Comments noted. The type and mix of housing to be provided is a matter for the Local Plan review and the comments will be considered during preparation of the plan. SA Objective 10 "To ensure the supply of high quality homes, which cater for identified needs" will enable an appraisal of likely significant effects to be undertaken.
12	JDI Baker	1	<ul style="list-style-type: none"> <li>Stated that The Food Futures Report (WRAP, 2015) and the Canterbury District Local Plan (2017) should be included in Chapter 3 and Appendix B of the Scoping Report.</li> </ul>	The SA will support the Local Plan review which will replace the Local Plan (2017), once adopted. It is therefore not necessary to include the Local Plan (2017) in the review of plans and programmes. However, the Food



				Futures Report (WRAP, 2015) has been included in the review of plans and programmes.
		2b	<ul style="list-style-type: none"> <li>Stated that nitrogen deposition effects on the Blean Complex SAC, from traffic on the A290, require careful attention as was shown by the AA for the 2017 LP.</li> <li>Suggested that a strategy to divert traffic from the A290 to the A299 &amp; A2 will be needed, making use of the new A2 off-sliproad at Wincheap in order to relieve Blean and the City Centre AQMA of through Whitstable-Canterbury traffic.</li> </ul>	<p>Comments noted. The Habitats Regulations Assessment (HRA) will consider the effects of traffic emissions associated with proposed development in the Local Plan on air quality and any changes to NOx deposition on European Sites.</p> <p>Objective 1 of the SA Framework references the need to reduce air pollution and improve air quality and includes specific Sub-Objectives relating to minimisation and mitigation of adverse impacts of air quality (Sub-Objective 1.2) and the achievement of air quality improvement objectives within designated AQMAs (Sub-Objective 1.3).</p> <p>The comments made that refer to traffic management strategies to improve air quality, rather than the SA will be noted by the Council and considered during the plan making process. No changes required.</p>
		3a	<ul style="list-style-type: none"> <li>Stated that in Table 2 of the Scoping Report the 2005 data for England is not credible and suggested that there must have been data input errors.</li> </ul>	Table 2 of the SA Scoping Report presents the percentage contribution of each fuel type to the entire fuel consumption for Canterbury, the South East and England between 2005 and 2016, provided by BEIS. The data presented has been revisited to ensure that it accurately reflects the original BEIS data which now covers up to 2017.
		3b	<ul style="list-style-type: none"> <li>Stated that the energy efficiency of buildings should be addressed in the Scoping Report, including retrofitting efficiency measures</li> </ul>	The SA Scoping Report highlights the need to become as energy efficient as possible, whilst reducing energy consumption as a key sustainability issue, this is supported by SA Objective 2. No change required.
		5a	<ul style="list-style-type: none"> <li>Highlighted that Paragraphs 7.1-7.4 of the Scoping Report do not mention the contribution of agriculture to the landscapes mentioned.</li> <li>Highlighted that Paragraph 7.7 fails to identify that the NPPF requires Grade 3 land to be divided into 3a and 3b, with the Planning treatment of each sub-grade fundamentally different.</li> <li>Stated that Paragraph 7.8 is not an accurate baseline and suggested it should set out approximate areas (ha.) and percentages of the different Grades in the District and not rely on a brief description.</li> <li>Stated that Chapter 7 lacks the extensive figures and calculations to support the baseline that are included in the other chapters of the Scoping Report.</li> <li>Highlighted that paragraph 7.14 does not mention developments being built on best quality agricultural land, and best agricultural soils not being preserved.</li> </ul>	Whilst the contribution of agriculture to the landscapes described in paragraphs 7.1 - 7.4 is not explicitly mentioned, maps 10 and 11 show these landscapes graphically and map 12 shows the agricultural land classifications for the same areas. This information has been updated to include specific reference to the contribution of agriculture to the landscape.

				<p>The information in paragraph 7.7 has been updated to distinguish between agricultural land sub-grades 3a and 3b as required by the NPPF.</p> <p>Whilst paragraph 7.8 does not describe the percentages or size (area) of different agricultural grades in the district, Map 12 graphically represents the distribution and proportion of different grades in the district. No change required.</p> <p>The information in paragraph 7.14 has been updated to include the following additional bullet point: <i>“Without a strategic planning framework for the area there is a chance that the best and most versatile agricultural land may be lost to inappropriate development.”</i></p>
		5b	<ul style="list-style-type: none"> <li>● Stated that the following sustainability issues should be addressed in the Scoping Report:                             <ul style="list-style-type: none"> <li>○ The avoidance of large-scale developments on best quality agricultural land.</li> <li>○ The preservation of best agricultural soils.</li> </ul> </li> </ul>	<p>These issues are already addressed within the SA Scoping Report as the SA Framework includes a specific SA Sub-Objective (Sub-Objective 11.2) relating to the avoiding unnecessary loss of best and most versatile agricultural land. No change required.</p>
		7b	<ul style="list-style-type: none"> <li>● Stated that flexibility for changing patterns of waste collection for recycling etc. needs to be built in.</li> <li>● Suggested that sharing of bins, e.g. for garden waste should be considered.</li> </ul>	<p>Comment noted. The comments will be noted by the Council and considered during the plan making process. Objective 8 of the SA Framework supports the promotion of the sustainable management of waste.</p>
		8b	<ul style="list-style-type: none"> <li>● Stated that Health sustainability should reflect the whole health economy, not just community (primary) health such as GPs and that hospital and mental health provision should be expressly included.</li> </ul>	<p>Comment noted. The SA Scoping Report refers to health infrastructure in its broadest sense, so that it incorporates mental as well as physical health.</p>
		9a	<ul style="list-style-type: none"> <li>● Suggested that the list of Locally Listed Buildings could further inform the baseline analysis.</li> </ul>	<p>The current baseline presented in the SA Scoping report already considers and references the 447 Locally Listed Buildings within the District. No change required.</p>
		10a	<ul style="list-style-type: none"> <li>● Suggested that data on the number of HMOs in different parts of the District could further inform the baseline analysis. Stated that this is an indication of unmet student housing need overflowing into the general housing stock and that CCC would have figures on the locations of these.</li> <li>● Stated that the baseline should reflect that without a Local Plan, there could be more HMOs as there would be no controls on change of use.</li> </ul>	<p>Comments noted. It is considered that the comment made regarding a potential increase in HMOs as a result of a lack of a Local Plan being in place is already covered in the future baseline section where it is stated that without a Local Plan there would be little regulation and strategic overview of housing developments leading it to be led by market forces.</p>
		11a	<ul style="list-style-type: none"> <li>● Suggested that data on the number of residents commuting out of the District to work could further inform the baseline analysis and that Census data would be a source.</li> </ul>	<p>Agreed. Figures for the number of residents commuting out of the District to work have been included in the baseline analysis.</p>





		11b	<ul style="list-style-type: none"> <li>• Stated that there should be a seeking of the reduction of out-commuting by encouraging a wide range of types of employment premises in the District.</li> <li>• Stated that the Scoping Report should address how planning policies can assist home-working</li> </ul>	Ensuring that jobs are provided in appropriate locations to meet the identified employment needs is highlighted as a key sustainability issue as supported by SA Sub-Objective 12.
		12a	<ul style="list-style-type: none"> <li>• Highlighted that Figure 23 is inaccurately represented in Paragraph 14.8. of the Scoping Report: Canterbury East had a drop in 2013/14, whereas there is a clear growth trend at Canterbury West.</li> <li>• Advised that record high passenger numbers at Canterbury West, coupled with much long-distance and tourist travel means that the booking hall facilities at Canterbury West are overloaded and require expansion.</li> <li>• Stated that Paragraph 14.11 is incorrect in respect of Park and Ride Wincheap as the 2008 WSP report showed that some of the site's users are transiting to site from the A2 via Rheims Way, thus increasing emissions compared to travelling into the City Centre and therefore this calculation needs to be reworked accordingly.</li> </ul>	<p>Agreed. The information in paragraph 14.8 has been amended to accurately reflect the data presented in figure 23 as per the comment by referring to Canterbury East rather than West.</p> <p>The need to expand specific public transport stations will be considered as part of the Local Plan review process. However, SA Sub-Objective 13.4 highlights the need for the Local Plan to "Encourage investment to improve transport infrastructure".</p>
		12b	<ul style="list-style-type: none"> <li>• Suggested that the following sustainability issues should be addressed in the Scoping Report:                             <ul style="list-style-type: none"> <li>○ The need to reduce travel-to-work distances outside the District.</li> <li>○ The need to provide and enhance full interchange facilities at transport hubs, such as town stations and the bus station.</li> <li>○ The need to manage HGVs onto the Strategic Road Network and keep them out of AQMAs and rural roads.</li> </ul> </li> </ul>	<p>Agreed in part. <u>"The need to reduce out-commuting"</u> as been added to the key sustainability issues. This in turn would support achievement of SA Sub-Objective 12.1 "Support the provision of jobs in the right places to meet the identified employment needs".</p> <p>It is considered that the second sustainability issue suggested, is already covered by the following existing sustainability issues in the SA Scoping Report: "Ensure that the provision of sustainable transport is appropriate in location, quantity and standard, to encourage mode shift." And "Encourage investment in transport infrastructure, to increase transport choice and reduce congestion"</p>
		13	<p>Suggested that the following sub-objectives be added to the Assessment Framework under the following objectives:</p> <ul style="list-style-type: none"> <li>• Objective 1.                             <ul style="list-style-type: none"> <li>○ Increase number of EVCPs available for public to use.</li> </ul> </li> <li>• Objective 6.                             <ul style="list-style-type: none"> <li>○ Increase provision and use of water butts, including by retrofitting.</li> <li>○ Promote greywater recycling within buildings.</li> </ul> </li> <li>• Objective 9.                             <ul style="list-style-type: none"> <li>○ Update Conservation Area Appraisals and use to measure improvements/harm to CAs.</li> </ul> </li> </ul>	<p>Objective 1: It is considered that this would be covered already in SA Sub-Objective 13.4: "Encourage investment to improve transport infrastructure".</p> <p>Objective 6: These are measures that are covered by SA Sub-Objective 6.3: "Promote the sustainable and efficient use of water".</p> <p>Objective 9: It is not considered that specific reference to Conservation Area appraisals is appropriate. However, with regards to harm, SA Sub-Objective 9.1 states: "Preserve and enhance designated heritage assets including their</p>



			<ul style="list-style-type: none"> <li>● Objective 12.                             <ul style="list-style-type: none"> <li>○ Reduce free parking at out-of-town retail / business centres.</li> <li>○ Allow genuine "local needs" housing schemes in villages.</li> </ul> </li> <li>● Objective 13.                             <ul style="list-style-type: none"> <li>○ Identify hotspot junctions / routes for investment to unblock jams using CIL funds.</li> </ul> </li> </ul>	<p>setting and contribution to local character and distinctiveness." This is considered to cover this aspect.</p> <p>Objective 12: Meeting housing needs is reflected in SA Objective 10. Reducing free parking is beyond the scope of the Local Plan and SA.</p> <p>Objective 13: These measures are beyond the scope of the SA. The comments will be considered as part of the Local Plan review preparation.</p>
		14	<p>Recommended the following indicators be used to assess progress against the following objectives:</p> <ul style="list-style-type: none"> <li>● Objective 2.                             <ul style="list-style-type: none"> <li>○ SAP ratings to assess energy performance of buildings.</li> </ul> </li> <li>● Objective 6.                             <ul style="list-style-type: none"> <li>○ Number of applications providing water butts and/or greywater recycling.</li> </ul> </li> <li>● Objective 9.                             <ul style="list-style-type: none"> <li>○ Involve World Heritage Site bodies.</li> </ul> </li> <li>● Objective 12.                             <ul style="list-style-type: none"> <li>○ Measure footfall in all 3 towns.</li> <li>○ Monitor the number of workers leaving the District to work.</li> </ul> </li> <li>● Objective 13.                             <ul style="list-style-type: none"> <li>○ Bus ridership figures; and traffic counts on key routes.</li> <li>○ Record origin data on P&amp;R users as part of next P&amp;R contract.</li> </ul> </li> </ul>	<p>Agreed. The monitoring indicators will be refined through the Local Plan preparation and SA process up to adoption of the Local Plan. With regard to 2.2 it is proposed to include "<u>Development meeting high levels of energy efficiency (e.g.BREEAM excellent rating)</u>" however further consideration will be required as to data available to monitor this.</p> <p>For Objective 6 "<u>Per capita consumption of water</u>" has been added to capture water use.</p> <p>With regards to Objective 9, the Council will engage with UNESCO as appropriate.</p> <p>For Sub Objective 12.1 it is proposed to monitor job density, jobs by occupation and economic activity and for 12.2-5 retail net completions. This data is readily available through the AMR and provides relevant measurable information on the issues of concern.</p> <p>Objective 13: The use of buses is measured effectively through existing data sources on modes of transport. It is therefore considered a broader indicator on "<u>Modes of transport used</u>" is appropriate and included. Park and Ride users is beyond the scope of indicators that could be included in the SA and it is unclear what this would show with regards to achievement of the objective.</p>
		15	<ul style="list-style-type: none"> <li>● Stated that there is little information on what has been learned through monitoring the previous two LPs, particularly in terms of policy approaches that have been successful or not.</li> <li>● Stated that there is no information on issues that are felt to be "cross-boundary issues" affecting neighbouring districts, data on which may need to be drawn partly from other authorities.</li> </ul>	<p>Comments noted.</p>

13	Dover District Council - Regeneration and Delivery Team (Stuart Watson)	15	<ul style="list-style-type: none"> <li>• Welcomed the opportunity to respond to the draft Sustainability and Strategic Environment Assessment scoping report and considered the report to be concise and detailed.</li> <li>• Stated that they would welcome further engagement with CCC as it progresses with the Local Plan and SA preparation.</li> <li>• Suggested that within the final scoping report it would be useful for completeness, to embed within the issue chapters how the international, national, regional and local policies for each issue have been considered, with their current significance alongside other tiered policies for the issue. They suggested that this approach would provide a more detailed policy context for the issues within the main body of the document.</li> <li>• Stated that it would have been useful within the SA scoping report consultation to have published draft assessment criteria for site allocations as this would have allowed an opportunity for feedback that could help inform the finalized assessment criteria for both the SA and SHLAA .</li> <li>• Stated that they would welcome any future opportunity to comment on any site allocations assessment criteria, or a revised SA and SEA scoping report.</li> </ul>	Comments have been noted and will be considered as the development of the SA and Local Plan progresses.
14	CPRE Kent (Paul Buckley)	1	<ul style="list-style-type: none"> <li>• Stated that The Climate Change Act 2008 (2050 Target Amendment) Order 2019: 2.—(1) Section 1 of the Climate Change Act 2008 and the Government Response to the Thames Estuary 2050 Growth Commission 25 March 2019; MHCLG should be included in Chapter 3 and Appendix B of the Scoping Report.</li> </ul>	<p>Agreed. The existing reference to the Climate Change Act (2008) has been updated so that it includes reference to the Climate Change Act (2050 Target Amendment) order 2019 and the updated 2050 target (greenhouse gas emission reduction of 100% rather than 80% by 2050) enacted by the order.</p> <p>The Government Response to the Thames Estuary 2050 Growth Commission (2019) has been included in the review of plans, policies and programmes.</p>
		2a	<ul style="list-style-type: none"> <li>• Stated that the impact of future development on major sites allocated in adopted Local Plan on AQMAs in Canterbury City centre should be analysed. Stated that these developments may have some impact on air quality and that this needs to be considered. Stated that the impact of existing allocations and proposed development on AQMA beyond the District boundary, such as on A2 in Swale Borough and A28 in Thanet District and vice versa must be considered.</li> <li>• Stated that under 'Key Sustainability Issues' the A299 is identified as a source of air pollution, however, the scale and extent of air pollution on A299 and impact of existing allocations is unclear.</li> </ul>	<p>Comments noted. SA Objective 1 will enable the likely significant effects of the Local Plan review's development locations on the District's AQMAs. More broadly the SA Objective would allow the impacts on other areas with AQMAs to be appraised where appropriate.</p> <p>The SA Framework supports the achievement of air quality improvement objectives within the designated AQMAs (Sub-Objective 1.3) and the general minimisation of poor air quality and encouragement of improvements in air quality (Sub Objective 1.2) and minimisation and mitigation of adverse effects of air quality (Sub Objective 1.2).</p>
		2b	<ul style="list-style-type: none"> <li>• Stated that the Appeal decisions and Court of Appeal Judgement on the Pond Farm, Newington planning application are relevant: Ref: APP/V2255/W/15/3067553 London Road, Newington, Kent ME9 7NL Ref: APP/V2255/W/16/3148140 London Road, Newington, Kent ME9 7NL</li> </ul>	Comment noted.

	3a/3b	<ul style="list-style-type: none"> <li>Stated that there is no reference in the Key Sustainability Issues to the role of settlement and distribution of new development in helping reduce congestion and pollution, through supporting improved public transport and facilitating active travel.</li> </ul>	<p>Comments noted. The Local Plan review will consider the spatial distribution across the district. The SA will appraise options for the distribution and consider the likely significant effects against the SA Objectives including against transport (SA Objective 13).</p>
	5b	<ul style="list-style-type: none"> <li>Stated that Canterbury has a disproportionately high proportion of land within grade 1 and 2 agricultural land and therefore it will be important to protect and preserve this valuable national resource. Highlighted that the adopted Local Plan has allocated grade 1 and 2 agricultural land for housing and stated that safeguarding best and most versatile agricultural land (Grades 1-3a) is a Key Sustainable Issue not only for the District but also the Country.</li> <li>Highlighted that agricultural land plays a vital role in absorbing carbon and preserving biodiversity, including the biodiversity in soils and once it is built over the soil biodiversity is lost. Stated that therefore, to minimise land take, it is essential that density of developments on green field sites is as high as reasonably possible.</li> </ul>	<p>Comments noted. The SA Scoping Report identifies the need to ensure that housing development takes place on the most appropriate, and where possible, previously developed land and at the right densities as key sustainability issues (Section 12. Housing). The SA Framework supports the encouragement of the efficient use of previously developed land (SA Sub-Objective 11.1), the avoidance of the unnecessary loss of best and most versatile agricultural land (SA Sub-Objective 11.2) and the encouragement of appropriate building densities within developments (SA Sub-Objective 11.3).</p>
	8a	<ul style="list-style-type: none"> <li>Highlighted that Table 4 sets out population change between 2001 and 2011 and that Tables 5 and 6 provide data for 2018 mid-year estimate (MYE) and stated that up to date MYE should be used.</li> <li>Highlighted that Figure 7 on age distribution of the population within the District is for 2011 and stated that again 2018 MYE is available and the most up to date MYE should be used.</li> <li>Stated that with regard to Household Deprivation, the 2019 Index of Multiple Deprivation is available and should be used.</li> <li>Highlighted that Paragraph 10.17 of the Scoping Report refers to the likely increase in student population, and stated that it will be important to understand the impact this may have on the loss of private homes to student accommodation.</li> </ul>	<p>Agreed in part. The mid-year population estimates used in tables 5 and 6 use the ONS 'Mid-2018: 2019 LA Boundaries' is currently the most up to date mid-year estimates data available at the administrative/local authority area level. The data used in Figure 7 is taken from the 2011 Census, but data in Table 6 shows the population change in the period between 2011 and 2018 (using the latest 2019 data).</p> <p>The 2019 Index of Multiple Deprivation will be used in future iterations of the baseline.</p>
	9a	<ul style="list-style-type: none"> <li>Stated that it is not clear in paragraph 11.3 of the Scoping Report if any buildings in Canterbury are on the HAR register and if so, what action will be taken.</li> </ul>	<p>Paragraph 11.4 of the SA Scoping Report describes that the Council maintains a Local HAR Register which includes the national assets identified by Historic England in the national HAR register, as well as information on local historic assets, which helps improve the protection, conservation and management of heritage in Canterbury District. Paragraph 11.4 notes that there are 7 entries in the Local HAR Register comprising 5 grade II listed buildings; 1 curtilage listed building; and 1 locally listed terrace.</p>
	11a	<ul style="list-style-type: none"> <li>Questioned whether it is appropriate to encourage greater reliance on the tourism sector given that tourism supports 16% of all employment.</li> </ul>	<p>The SA Scoping Report highlights that tourism rates should continue to grow in a sustainable manner, as supported by SA Sub-Objective 12.4. The policies for</p>

				tourism will be determined through the Local Plan preparation process.
		12a	<ul style="list-style-type: none"> <li>Stated that Census 2011 data on walking and cycling to work is available by ward and can help provide a District wide understanding and complement the Counts on Cycle Routes.</li> </ul>	The SA Scoping Report breaks down the methods of how people travelled to work (including cycling and walking) for the District as a whole, using the 2011 Census data in Figure 27. This is considered proportionate to the Local Plan. The inclusion of ward level data is not considered appropriate for the SA to determine the likely significant effects of policies and proposals.
		12b	<p>Stated that the following sustainability issues should be addressed in the Scoping Report:</p> <ul style="list-style-type: none"> <li>The need to promote a sustainable settlement pattern that reduces congestion and air pollution through improved public transport and facilitates and increased active travel.</li> <li>If electric car usage is to be encouraged, then there will need to be a significant increase in the number and distribution of high-speed charging points. Highlighted that at present there are only 2 high speed charging points and that slow charging points do not encourage or incentivise people to use them. Suggested that high speed charging points can give the District a unique selling point.</li> </ul>	<p>Comments related to the sustainable pattern of development have been addressed in earlier comments.</p> <p>The comments on the need for electric vehicle charging points relate to the contents of the Council's new Local Plan, rather than the SA, and will be noted by the Council and considered during the plan making process.</p>
		13	<p>Suggested the following amendments/ additions are required to the objectives/sub objectives to ensure the proposed SA Framework reflects the baseline analysis:</p> <ul style="list-style-type: none"> <li>Objective 1. <i>To reduce air pollution and encourage improvements in air quality</i> <ol style="list-style-type: none"> <li>Include a sub objective to promote alternative modes of transport – public transport and active travel</li> </ol> </li> <li>Objective 2. <i>To reduce the causes and adverse impacts of climate change, and promote energy efficiency</i> <ol style="list-style-type: none"> <li>Include a sub objective to promote alternative modes of transport (public transport and active travel)</li> <li>All new homes and buildings to be net zero carbon emissions in operation by 2030 at the latest.</li> <li>Support Passivhaus design and standard.</li> </ol> </li> <li>Objective 11. <i>To promote the sustainable use of land and conserve soil quality</i> <ol style="list-style-type: none"> <li>Amend sub-objective 11.2 to read 'Avoid the unnecessary loss of best and most versatile agricultural land.'</li> <li>Encourage carbon sequestration</li> </ol> </li> <li>Objective 13. <i>To promote and encourage sustainable transport</i> <ol style="list-style-type: none"> <li>Include a sub objective to promote alternative modes of transport (public transport and active travel)</li> <li>Include a sub objective to promote the provision of high speed EV charging points</li> </ol> </li> </ul>	<p>Comments noted. With regard to the suggestions made relating to:</p> <p>Objective 1: It is considered that this is already covered by Objective 13 under Sub-Objective 13.1.</p> <p>Objective 2:</p> <ol style="list-style-type: none"> <li>It is considered that this is already covered by Objective 13 under Sub-Objective 13.1</li> <li>It is considered that this is already covered by Objective 2 and in particular by Sub-Objectives 2.1 And 2.2 – it is not appropriate for the SA to set specific targets, this will be considered in the Local Plan, which the SA will appraise.</li> <li>As above.</li> </ol> <p>Objective 11:</p> <ol style="list-style-type: none"> <li>Suggested wording for 11.2 is the same as current wording so no change required.</li> <li>Agreed. However, it is considered this is best placed under Objective 3. Additional sub objective to read <u>"Encourage carbon sequestration"</u>.</li> </ol> <p>Objective 13:</p>

				<ol style="list-style-type: none"> <li>1. It is considered that this is already covered by Objective 13 by Sub-Objective 13.1</li> <li>2. It is considered that this would be effectively covered already in 13.1 and 13.4. However, should the Local Plan provide policy on EVCP an indicator may well be appropriate. Indicators are refined through the plan preparation and iterative SA process and are confirmed on plan adoption.</li> </ol>
		14	<ul style="list-style-type: none"> <li>• Stated that the Local Plan and SA/SEA will need to guide development options and locations such that they support zero carbon emissions by 2050 in light of the growing importance/focus of reducing carbon emissions and tackling climate change.</li> </ul>	The Council, as part of the development of the Local Plan review, will consider specific development options and locations to support a reduction in carbon emissions. The SA Framework, which will be used to appraise the Local Plan Review includes a specific Objective (2) for the reduction of the causes and adverse impacts of climate change and promotion of energy efficiency.
15	Canterbury Society (Jan Pahl)	1	<ul style="list-style-type: none"> <li>• Highlighted that members of the Canterbury Society felt that previous comments had no impact on the adopted Local Plan. They stated that this has resulted in widespread disillusion with the process of consultation, at least as far as the Local Plan is concerned and did not to submit further comments.</li> </ul>	Comments noted. The comments on consultation will be considered as part of the Local Plan preparation process. The SA Report, which supports the Local Plan, requires consultation on its findings in line with the 2004 Regulations.
16	Keith Bothwell	1	<ul style="list-style-type: none"> <li>• Stated that the Centre for Alternative Technology report 'Zero Carbon Britain: Rising to the Climate Emergency' 2019 revision and the CCC's Declaration of a Climate Emergency and its target to reduce carbon emissions to net zero by 2030 should be included in Chapter 3 and Appendix B of the Scoping Report.</li> </ul>	Agreed in part. The ' <i>Zero Carbon Britain: Rising to the Climate Emergency</i> ' (Centre for Alternative Technology) represents the views of one organisation. The other plans and programmes included in the review have been developed to meet international agreements, legislation or have been published by a democratically representative body. This document has therefore not been added. The baseline has been revised to include reference to the climate emergency declared by the Council.
		2a	<ul style="list-style-type: none"> <li>• Suggested that all data collected by Professor Stephen Peckham and his team at the University of Kent should be included to further inform the baseline analysis.</li> <li>• Stated that data must include peak concentrations as well as average levels of pollution.</li> </ul>	The SA Report will rely on robust, verified evidence on air quality such as that contained within the 2019 Air Quality Annual Status Report (ASR) (and any future updates) to determine likely significant effects on achievement of SA Objective 1. No change required; although any additional data such as that referenced by the submission will be reviewed when SA is undertaken of the iterations of the draft Local Plan, to ensure the plan is based on up-to-date evidence.

		3b	<ul style="list-style-type: none"> <li>● Suggested that the unrestrained consumption of goods and products must be addressed. Stated that the unnecessary purchasing of goods is a major contributor to carbon emissions and ecological damage.</li> <li>● Suggested that local residents should be encouraged to:                             <ul style="list-style-type: none"> <li>○ Reduce their purchases to what is really necessary</li> <li>○ Repair items rather than replace them where possible</li> <li>○ Share infrequently used equipment, such as lawnmowers, hedge trimmers, other equipment</li> <li>○ Share cars</li> </ul> </li> <li>● Suggested a district wide network of repair cafes, that could also facilitate sharing and swapping of clothes and other items would help to address this issue.</li> </ul>	Comments noted. The comments regarding consumption are not within the scope of the Local Plan or SA.
		4b	<ul style="list-style-type: none"> <li>● Suggested the following:                             <ul style="list-style-type: none"> <li>○ All development should be prioritised on brownfield sites.</li> <li>○ Development on greenfield sites should be actively discouraged, especially when this is a semi-natural or natural habitat (i.e. not intensively farmed fields).</li> <li>○ Wildlife zones and corridors should be actively expanded.</li> <li>○ Rewilding should be implemented in certain areas — for example with the reintroduction of beavers and other animals that contribute to reducing flood risk and expanding biodiversity.</li> </ul> </li> </ul>	<p>Comments noted. The comments relate to issues that the Local Plan should address, rather than the SA, and will be noted by the Council and considered during the plan making process.</p> <p>However, the SA Scoping Report highlights the need to encourage development on previously developed land as a key sustainability issue as supported by SA Objective 11 and particularly Sub-Objective 11.1.</p> <p>The SA Scoping Report also highlights the need to ensure that development does not negatively impact biodiversity and conserves and enhances biodiversity and protected sites as well as achieving biodiversity net gain including creating and enhancing well-connected and functional habitats as key sustainability issues, as supported by SA Objective 3.</p>
		5b	<ul style="list-style-type: none"> <li>● Suggested that rewilding should be implemented in key areas, to increase biodiversity, increase biomass and thereby increase Carbon sequestration.</li> </ul>	Comments noted (as above response). An additional Sub Objective to Objective 3 " <u>Encourage carbon sequestration</u> " has been added.
		6b	<ul style="list-style-type: none"> <li>● Suggested that rewilding, for example by reintroducing beavers and other animals, will reduce flood risk, and at the same time increase biodiversity.</li> </ul>	<p>Comments noted. The comments relate to issues that the Local Plan should address, rather than the SA, and will be noted by the Council and considered during the plan making process.</p> <p>However, the SA Scoping Report highlights the need to conserves and enhance biodiversity and protected sites as well as achieving biodiversity net gain including creating and enhancing well-connected and functional habitats as</p>

				key sustainability issues, as supported by Objective 3 and the Sub-Objectives that sit underneath it.
		7b	<ul style="list-style-type: none"> <li>• Stated that waste will be significantly reduced if people consume fewer goods.</li> <li>• Suggested that the Council should facilitate the introduction of a network of repair cafes to help encourage people to repair broken goods rather than buying new ones.</li> <li>• Suggested that contractors should be encouraged to reduce waste on site, and to recycle all site construction waste, potentially through penalties for non-compliance.</li> </ul>	Comments noted. The comments relate to issues beyond the scope of the Local Plan and SA. However, the SA Scoping Report highlights the need to ensure that the waste hierarchy continues to be implemented so that reuse options (recycling, composting and electricity) continue to increase as the preferred option over final disposal of waste as a key sustainability issue, as well as the need to reduce the volume of waste produced by new development, change of uses or conversions. This is supported by SA Objective 8.
		10b	<ul style="list-style-type: none"> <li>• Suggested that a large scale programme of retrofitting housing should be actively encouraged which would reduce carbon emissions.</li> <li>• Suggested that empty houses should be compulsorily purchased using the powers that the Council already has, which would reduce the carbon emissions and environmental damage caused by building new houses.</li> </ul>	Comments noted. The comments relate to issues that the Local Plan should address, rather than the SA, and will be noted by the Council and considered during the plan making process. The SA Scoping Report highlights the need to become as energy efficient as possible and reduce carbon emissions as key sustainability issues, whilst the SA Objective 2 relates to the promotion of energy efficiency and reduction of the causes of climate change.
		12b	<ul style="list-style-type: none"> <li>• Suggested that a network of sustainable transport routes should cross the district, with safe and green routes for pedestrians and cyclists.</li> <li>• Stated that large scale investment is required in public transport and should be funded through increased charges for car users and restrictions on the most polluting vehicles.</li> <li>• Suggested that an Ultra-Low Emissions Zone be introduced.</li> </ul>	Comments noted. The comments relate to issues that the Local Plan should address, rather than the SA, and will be noted by the Council and considered during the plan making process. However, ensuring that the provision of sustainable transport is appropriate in location, quantity and standard, to encourage mode shift is a key sustainability issue in the SA Scoping Report, while SA Objective 13 supports the promotion and encouragement of sustainable transport methods.
17	The Whitstable Society (Graham Cox)	2a	<ul style="list-style-type: none"> <li>• Stated that it should be made clear that for pollution expectations and interventions that the baseline assumption for take-up of electric vehicles cannot be over optimistic.</li> <li>• Considered that the Council is failing in its duty by not collecting hourly pollution data as baseline where the local population advises that a problem of pollution exists. For example, pollution levels at certain peak times of day greatly exceed legal limits, but the 24 hour average is within legal limits. Considered that not to recognise such situations in the baseline is negligent.</li> </ul>	The SA Report will rely on robust, verified evidence on air quality such as that contained within the 2019 Air Quality Annual Status Report (ASR) (and any future updates) to determine likely significant effects on achievement of SA Objective 1. No change required.
		3b	<ul style="list-style-type: none"> <li>• Stated that the baseline should include data on the use of cycling and highlighted that cycling has fallen in West Whitstable in recent decades due to increasing traffic and lack of cycling protection measures such as those taken within the city.</li> </ul>	Comments noted. Figures 21 and 22 of the SA Scoping Report includes data on cycle counts on key cycle routes throughout the district including a comparison of historic counts. Figure 27 includes data on the use of cycling as a mode of transport used to travel to work in the district,



				compared to other modes. This combination of data is considered proportionate for the SA.
		5a	<ul style="list-style-type: none"> <li>Highlighted that the Bogshole Valley from Ellenden Woods to the Crab and Winkle path, and from Blean Woods to Clapham Hill was omitted as a landscape unit in the extant Local Plan without a legally valid reason and stated that it should be reinstated.</li> </ul>	Comments noted. The comments relate to issues that the Local Plan should address, rather than the SA, and will be noted by the Council and considered during the plan making process.
		10a	<ul style="list-style-type: none"> <li>Stated that the baseline should include the road infrastructure in relation to the total increase in houses from estates to single units and other sources of traffic growth.</li> <li>Stated that the Local Plan should baseline the number of bungalows to check, in the context of lift-accessed flats, the provision for less mobile people.</li> </ul>	It is considered that the baseline provides adequate and proportionate information for transport and roads. The respondent's comment on bungalows will be considered as part of the Local Plan preparation. No change required.
		11a	<ul style="list-style-type: none"> <li>Stated that the makeup of the local economy should be baselined. Stated that for example, the baseline should reference the number of people working from home and the percentage of car commuters, which they considered must have risen significantly in the last two decades. Highlighted that this point was also relevant in the transport infrastructure sections.</li> <li>Stated that the limitations of infrastructure on growth, such as pavement provision, should be built into the baseline.</li> </ul>	Disagreed. The Economy baseline (Section 13) covers unemployment, economic activity, education and qualifications, job density, occupations, tourism and employment, retail and office floorspace. The transport section (14) covers travel to work. The baseline is considered appropriate and proportionate to the scoping of the SA. The importance of infrastructure is identified through many of the baseline sections.
		12a	<ul style="list-style-type: none"> <li>Stated that there appears to be little baselining for infrastructure except for car parking. For example, infrastructure that is inadequate and not scheduled for relief under the current Local Plan, or the status of which has been worsened by the previous or former Local Plans.</li> <li>Highlighted that in the transport section of the Scoping Report the only reference to 'through routes' and commuter routes is regarding 'the City of Canterbury', which does not acknowledge the existence of both the Old and New Thanet Way. Stated that this was also the case for the previous Local Plan in which the respondent complained and stated that the baseline must include The Thanet Way.</li> <li>Stated that the issue of out-of-town free parking and the impact on centres that have car access needs to be analysed in the transport section of the Scoping Report and recognised in the baseline.</li> </ul>	The comments relate to the Local Plan review and will be considered as part of the preparation of the Local Plan.
		12b	<ul style="list-style-type: none"> <li>Stated that the baseline must not include any statements which refer to the use of Wincheap Park and Ride by vehicles from Whitstable, as the length of the journey involved is contrary to sustainability and climate objectives.</li> </ul>	The SA Scoping Report Section 14 refers to the use of Wincheap Park and Ride in a general sense alongside New Dover Road and Sturry Road Park and Rides (in terms of total number of car trips that have been removed from Canterbury City Centre since the data was first gathered) rather than specifying the origin of users of the Park and Ride. Figure 24 presents historic total numbers of people that have used Wincheap Park and Ride for each year between 2002 and 2018 but again does not mention the origin of people/vehicles that used the Park and Ride. No change required.
		15	<ul style="list-style-type: none"> <li>Highlighted that there appears to be no information regarding the baselining of areas and aspects shared with other planning authorities where a cross boundary issue may occur. Stated that this point</li> </ul>	The SA will consider cross-boundary effects where appropriate however, the process of joint working is

			is proven by the absence of reference to Ashford, Swale, Shepway or Thanet. Advised that it is a legal requirement for these to be considered if only to say that there are no shared area matters that the Local Plan should cover or discuss with other authorities.	considered to be a procedural matter under the Duty to Cooperate as opposed to a potential socio-economic or environmental effect of the implementation of the Local Plan and one that requires consideration as part of the SA.
18	Alliance of Canterbury Residents Associations (ACRA)	General Comments	<ul style="list-style-type: none"> <li>Stated that within the context of Civic Voice ABC campaign, the apparent secrecy of the Local Plan Steering Committee should be independently reviewed with a view to making part of the Committee's proceedings open to public scrutiny.</li> <li>Stated that there appears to be little evidence of information sharing with neighbourhood planning authorities where over-lapping issues occur and that the resulting absence of strategic focus for East Kent as a whole</li> </ul>	The concerns regarding transparency of Local Plan preparation will be considered as part of the Local Plan review process.
		General Comments	<ul style="list-style-type: none"> <li>Considered that the Scoping Report lacks cohesion and reads as a series of unconnected sections, and that a holistic approach was required for the subsequent Local Plan to be fit for purpose.</li> <li>Suggested that it would be helpful to know the timetable envisaged for the process of updating the background starting points during the Local Plan preparation.</li> <li>Considered that the provision of infrastructure baselines throughout the report was patchy and stated that with regard to the Transport section of the Scoping Report, the lack of this data was especially conspicuous.</li> <li>Highlighted that there was a lack of recognition of the cumulative impact of various developments in recent years and that there was no assessment of the total environmental pressures of projects in the planning pipeline.</li> </ul>	Disagreed. The SA Scoping Report provides an appropriate and proportionate collation of baseline evidence to establish the key sustainability issues.
		1 (Introduction)	<ul style="list-style-type: none"> <li>Stated that clarification was required regarding the student population and its contribution to the baseline</li> </ul>	Disagreed. The baseline (Section 13) provides sufficient information on student population as a proportion of the overall population.
		4 (Air Quality)	<ul style="list-style-type: none"> <li>Stated that Air Quality data should include the provision of figures which show the ranges of daily and hourly changes, adding that the continued use of 24 hour/ 365 day mean averages is misleading.</li> <li>Stated that CCC must address the omission of range data if its declaration of Climate Emergency is to be accepted as a genuine commitment.</li> <li>Stated that Air Quality improvement around the city centre must not be delayed.</li> </ul>	<p>It is considered that the data presented in the baseline section is proportionate to the SA of the Local Plan. The SA Report will rely on robust, verified evidence on air quality such as that contained within the 2019 Air Quality Annual Status Report (ASR) (and any future updates) to determine likely significant effects on achievement of SA Objective 1. No change required.</p> <p>The SA Framework includes a specific SA Objective (1) relating to the reduction of air pollution and encouragement of improvements in air quality.</p>
		5 (Climate Change, Adaption and Mitigation)	<ul style="list-style-type: none"> <li>Stated that regarding carbon emissions from Industry, it should be remembered that some industrial emissions have effectively been exported, especially to Asia/China, from where imported manufactured products are shipped at an environmental cost and that alternative local production could reduce global emissions.</li> <li>Highlighted that retention of large scale housing stock of lower energy efficiency (even with insulation upgrades etc) will contribute to long term inefficiencies.</li> </ul>	Comments noted. The SA Framework contains a specific SA Objective (2) relating to the reduction of the causes and adverse impacts of climate change and the promotion of energy efficiency. However, it is noted that existing housing stock presents challenges to achieving greater energy efficiency, although the SA would encourage

				achievement of all measures that increase energy efficiency.
		7 (Landscape and Geology)	<ul style="list-style-type: none"> <li>Noted that agricultural land quality was referred to in the Landscape and Geology section of the Scoping Report but it is not specifically identified later in this section of the Scoping Report.</li> <li>Advised that without planning out the use of the best and most versatile land, there is danger of repeating the errors of the current Local Plan and building on high grade, productive and sustainable local food land and considered that this should be identified in the baseline and as a Key Sustainability Issue. Acknowledged that this is covered in the SA Framework, but considered that it should be given greater emphasis.</li> </ul>	The SA Scoping Report identifies the need to ensure that development takes place on the most appropriate, and where possible, previously developed land and at the right densities as key sustainability issues (Section 12. Housing). The SA Framework includes a specific SA Sub-Objective (Sub-Objective 11.2) relating to the avoiding unnecessary loss of best and most versatile agricultural land, so it is considered that these issues are effectively covered within the SA Scoping Report. No change required.
		8 (Water: Flooding, Quality and Resources)	<ul style="list-style-type: none"> <li>Stated that flood risk maps that identify known high risk areas need to be made available and easily accessible in the public domain. Highlighted that no mention was made in the Scoping Report to adaption plans risk and resilience and that these elements should be regarded as essential.</li> </ul>	Comments noted. Flood Risk maps are available online via the Environment Agency's website. The SA Scoping Report key sustainability issues include the "Prepare against flooding and ensure development is appropriately placed. Where necessary ensure the appropriate mitigation or development design is used."
		9 (Waste)	<ul style="list-style-type: none"> <li>Considered that the Waste section of the Scoping Report was overly simplistic and inadequate. Stated that circular economy and other current radical thinking/ practical response measures should be covered in the Waste section of the Scoping Report.</li> <li>Considered that the sustainability issues mentioned are out dated in terms of the waste hierarchy being used and that this section of the report should be framed as 'Waste and Resource' rather than 'Waste'.</li> <li>Stated that the transportation of large quantities of waste far from Canterbury is not sustainable.</li> <li>Stated that there must be clarification regarding the end point and transport impact of current recycling arrangements and that attempts made to obtain this information in the past have been met with obfuscation.</li> </ul>	Disagreed. Section 9 of the Report covers waste in a manner appropriate and proportionate to the SA.
		10 (Population and Human Health)	<ul style="list-style-type: none"> <li>Highlighted that the high proportion of students relative to residents in Canterbury places substantial strain on community infrastructure and supporting health and social services and that this impact requires quantitative calculation and qualitative appraisal.</li> <li>Highlighted that the Scoping Report did not reference the dementia 'time bomb' and that the ageing demographic in Canterbury is particularly pronounced and will have a significant impact on the local economy.</li> </ul>	Agreed. The baseline information (contained in Section 10) has been amended to include a reference to the growing number of people aged over 70 and associated health impacts.
		11 (Historic Environment)	<ul style="list-style-type: none"> <li>Stated that there is a lack of objective criteria for Conservation Area definition, leading to arbitrary designations and decisions and that greater clarity is required in order to ensure that these areas are protected in the planning process.</li> </ul>	Comment noted. The comment relates to matters for beyond the scope of the Local Plan or SA. However, the SA includes SA Objective 9 to consider the likely significant effects on the historic environment.
		12 (Housing)	<ul style="list-style-type: none"> <li>Highlighted that the data on student housing omits the blocks now nearing completion.</li> <li>Stated that new Purpose Built Student Accommodation (PBSA) has been allocated to proceed unchecked and as a result community cohesion and inclusivity have been lost in the process.</li> </ul>	Comments noted. The comments made (that relate to potential development strategies and issues that the Local Plan should address) are not relevant to the scope of the

			<ul style="list-style-type: none"> <li>• Stated that the less than ten percent limit for student accommodation within a sustainable community has been disregarded.</li> <li>• Highlighted evidence that there is now an oversupply of PBSA in Canterbury and other cities as second and third year students prefer to live in HMO's.</li> <li>• Advised that it is difficult to convert PBSA's with a living space of 25 square metres for small families</li> <li>• Highlighted that past development and exhaustion of brownfield sites has been a key driver to the need to develop on greenfield sites, which are more easily developed and therefore favoured by developers, but take land out of food production permanently and result in longer travelling distances than would be the case with housing closer to the city/town centres and considered that they are unsustainable.</li> </ul>	<p>SA which is a process to determine likely significant effects of the Local Plan. However, the comments will be noted by the Council and considered during the plan making process.</p> <p>With regard to accommodation, the SA Scoping Report highlights the need to "To ensure the supply of high quality homes, which cater for identified needs" (SA Objective 10).</p>
		12(Housing)	<ul style="list-style-type: none"> <li>• Highlighted that past development and exhaustion of brownfield sites has been a key driver to the need to develop on greenfield sites, which are more easily developed and therefore favoured by developers, but take land out of food production permanently and result in longer travelling distances than would be the case with housing closer to the city/town centres and considered that they are unsustainable.</li> <li>• Highlighted that existing car parks feature heavily in the brownfield register and suggested that recent years' completions and prospective sites are in terms of Brown and Green field, and potential brown sites are restricted within the definition required, thus potentially adversely increasing the allocation of green fields.</li> <li>• Suggested that smaller parcels of existing developed land with potential for higher density development/ conversion when considered with adjoining parcels should be promoted as a "third way" in addition to Brownfield and Greenfield development. Including the 1930's and 1950's council housing in all 3 major urban areas. <ul style="list-style-type: none"> <li>○ they tend to have large gardens, thus developed to low density by current standards;</li> <li>○ the housing stock is varied in quality;</li> <li>○ both the Local Authority and investors own blocks, or are in a position to amalgamate blocks for redevelopment;</li> <li>○ recent history has shown that under-developed sites of similar housing are viable for private sector developers such schemes will become more viable as values move ahead of costs, and in the event of more restricted greenfield opportunities; and,</li> <li>○ these would be sustainable in terms of greenfield land retention and transport.</li> </ul> </li> <li>• Stated that given the extent of these estates represents potentially massive sustainable redevelopment potential, provided that the Local Plan includes a policy that indicates the Authority will look favourably on such schemes. Suggested that in the past such opportunities may have been regarded as windfalls and now they should be regarded as part of the planning solution at an early stage. Suggested it is likely that redevelopment opportunities will arise first on the edges of estates, where values are higher.</li> </ul>	<p>Comment noted. The comments made relate to potential development strategies and are therefore not relevant to the SA which is a process to determine likely significant effects of the Plan. However, the comments will be noted by the Council and considered during the plan making process.</p> <p>However, the SA Scoping Report highlights the need to: direct development to previously developed and the most appropriate land; ensure that developments are built to appropriate densities and maximise land available without over developing; and, ensure a high quality of design as key sustainability issues. Furthermore, the SA Framework includes an objective (SA Objective 11) relating to the promotion of the sustainable use of land including specific sub-objectives relating to the efficient use of previously developed land (Sub-Objective 11.1) and the encouragement of appropriate building densities within developments (Sub-Objective 11.3).</p>
		13 (Economy)	<ul style="list-style-type: none"> <li>• Stated that the Economy section of the scoping report was conceptually outdated.</li> <li>• Stated that the sustainability issues need to mention exploration of proactive issues on the Economic Index of Welfare.</li> <li>• Stated that a mixed economy of small and medium-sized enterprises (SMEs) should be promoted.</li> </ul>	<p>Disagreed. It is considered the economy baseline (Section 13) is proportionate and appropriate for the SA.</p> <p>The remaining comments relate to issues that the Local Plan should address, rather than the SA, and as such will</p>

			<ul style="list-style-type: none"> <li>• Stated that there should be recognition of the rising role of the Voluntary Community and Enterprise Sector as an important part of the economic health of the area.</li> <li>• Stated that there should be greater emphasis on the localisation of supply chains.</li> <li>• Stated that there needs to be optimisation of public sector leverage in sustainable procurement.</li> </ul>	be considered by the Council during the Local Plan Review.
		14 (Transport)	<ul style="list-style-type: none"> <li>• Proposed the following additional/substitute criteria and data for use by the council when determining sustainable transport ambitions in the Local Plan and Transport Strategy:                             <ul style="list-style-type: none"> <li>○ Measurement of origin, destination and number of journeys by pedestrians in and around the city and measurement of bicycle journeys, including people walking to and from, railway stations, hospital, schools and universities.</li> <li>○ Measurement and disaggregation of journeys by car and van into, out of and around the city during peak hours rather than daily/yearly averages, which it is suggested that have likely been driven down by change of shopping and leisure habits in off peak hours.</li> <li>○ Data about patterns of parking, including origins of vehicles more broadly should be collected if the council wishes to incentivise modal shift and whilst protecting revenue from council owned car parks and potentially securing revenue from future commercial car parking facilities.</li> </ul> </li> <li>• Stated that urgent consideration needs to be given to the creation of Low Emissions Zones linked to designated AQMAs and supported by a range of practical and financial incentives and penalties to incentivise modal shift and sustainable forms of transportation.</li> <li>• Considered that the statement that “the city has a well established cycle network” in the Scoping report is not true, stating that although the city does have some long established cycle paths, they are piecemeal, sometimes unsafe, not well maintained and are not a network.</li> </ul>	<p>Comments noted. The Council will consider the comments as part of the preparation of the Local Plan.</p> <p>The SA Scoping Report refers to the cycle network and the number of users which suggests there has been an increase in recent years. No changes are required, however, the key sustainability issues identifies the need to “Ensure that the provision of sustainable transport is appropriate in location, quantity and standard, to encourage mode shift” and “Encourage investment in transport infrastructure, to increase transport choice and reduce congestion.” This recognises that further investment is required in transport infrastructure.</p>
19	Ashford Borough Council	General Comment	<ul style="list-style-type: none"> <li>• Stated that at this stage they had no comment to make.</li> </ul>	Noted.
20	C S Brown	3. (Plans, Policies, Programme)	<ul style="list-style-type: none"> <li>• Advised that the government’s website provides guidance on Brexit secondary legislation and notes the Statutory instruments which have been laid and identified as having an impact on local authorities. Stated that given the uncertainty with the outcome of the general election (Dec 2019) and the new government’s position on the EU it is not likely that the Scoping Report consultation will provide appropriate feedback to the Council for the consideration of the District’s future strategy during the plan period up until 2041.</li> <li>• Highlighted that only one mention of Brexit was found in the draft Scoping Report in a footnote (page 21) in the Biodiversity section of the Scoping report. Stated that it would be helpful to understand to what extent has the anticipated effect of a no deal Brexit been assessed for the purposes of the draft Scoping Report.</li> </ul>	The SA Scoping Report was written using best endeavours to take account of the changing circumstances. The UK has now left the EU and the contextual information provided within the SA Report will need to ensure it is reviewed and aligned with any subsequent changes.
		5 (Climate Change, Adaption and Mitigation)	<ul style="list-style-type: none"> <li>• Highlighted that Paragraph 5.1 of the Scoping Report refers to the IPCC Special Report released in October 2018, however the IPCC have since published <i>Climate Change and Land</i> in August 2019 and <i>The Special Report on the Ocean and the Cryosphere in a Changing Climate</i> in September 2019. Questioned to what extent these reports have been assessed for the purposes of the Draft SA.</li> </ul>	Agreed. IPCC Climate Change and Land in August 2019; The Special Report on the Ocean and the Cryosphere in a Changing Climate in September 2019; and UK Climate Projections September 2019 will be added to the plans, programmes review. The Paris Agreement is already included in the review.

			<ul style="list-style-type: none"> <li>Stated that these types of weather have negative impacts on the population and the various forms of infrastructure and that infrastructure will need to be adapted to cope with the new climate conditions and proposed works will also need to be suitably designed to meet them.</li> <li>Stated that the SA should be drafted and assessed against the current predicted climate conditions including the Met Office’s UK Climate Projections September 2019 (version 2).</li> <li>Stated that the Draft SA should be suitably strengthened to reflect the UN’s advice in its Gap Report 2019 which warns that unless emissions fall by 7.6 percent each year between 2020 and 2030 the world will fail to meet the 1.5C temperature goal of the Paris Agreement.</li> </ul>	<p>The SA Scoping Report recognises the effects of climate change in the baseline and key sustainability issues. Objective 2 sets out the objective to mitigate and adapt to the effects of climate change.</p>
		8 (Water: Flooding, Quality and Resources)	<ul style="list-style-type: none"> <li>Noted that climate change has had an effect on the number, scale and duration of rainfall events which have resulted in increased flooding of properties and land, and coupled with rising sea levels and the sinking of land, particularly in the South East, flooding has become a major problem for communities and existing infrastructure and their ability to cope with future events.</li> <li>Highlighted that severe downpours can overwhelm existing drainage systems and that this can be exacerbated by the loss of green space in towns and development on greenfield land, with the remaining undeveloped land not being able to absorb the increased runoff, potentially resulting in a flood.</li> <li>Stated that it is unclear how options to reduce run-off including the use of sustainable urban drainage systems (SUDS) under the 2010 Flood and Water Management Act has been addressed in the SA. Highlighted that CIRIA recently published <i>guidance on delivering better water management through the planning system (C787)</i> which deals with making places more resilient to climate change and delivering better local environments and this could inform the Draft SA.</li> </ul>	<p>Comments noted. Section 5 highlights that flooding and extreme weather are a feature of climate change. SA Objective 7 highlights the need to address flooding and prevent coastal erosion. SA Objective 2 refers to climate change mitigation/adaptation specifically.</p> <p>SA Sub objective 7.1 “Promote the sustainable and efficient use of water resources” and includes the number of SuDS as indicator.</p> <p>No changes required.</p>
21	Environment Agency	8 (Water: Flooding, Quality and Resources)	<ul style="list-style-type: none"> <li>Highlighted that under the future baseline without the Local Plan, housing would be constructed to a standard appropriate nationwide, but recommended that higher standards should be used. Stated that the same consideration might be applied to non-residential developments covered in section 13, however there is no national standard.</li> <li>Stated that it would be good to see the same strongly reflective approach to the impact of policy decisions on the environment that is featured within section 14 of the Scoping Report, in sections 12 and 13.</li> </ul>	<p>Comments noted. The baseline sections provide a description of the social, environmental and economic baseline characteristics and the predicted future baseline in a manner proportionate to the effects of the Local Plan.</p> <p>With regards to water efficiency standards, it is a matter for the Local Plan review to determine whether there is sufficient evidence to support higher standards than standard Building Regulations. The comments will be considered during preparation of the plan.</p>
		Appendix A (Indicators)	<ul style="list-style-type: none"> <li>Highlighted that in Appendix A row 6.3 there is no measure of efficient water use and suggested that a possible measure would be total water consumption, or per capita consumption, derived from water company annual returns, taken as a running mean to balance out weather variability and, additionally, per capita water consumption specifically in new developments.</li> <li>Highlighted that in Appendix A the measures for row 10.6 (Promote High quality design in new housing developments) are blank and suggested that this could include per capita water consumption, or target consumption amongst other measures.</li> </ul>	<p>Agreed in part. Per capita consumption to be included as an indicator for Sub-Objective 6.3 to be taken from Southern Water and South East Water data. However, Sub-Objective 10.6 reflects broader design measures and it is considered that addition of an indicator to Sub-Objective 6.3 would suffice.</p>



	Appendix B (Policies, Plans and Programmes)	<ul style="list-style-type: none"> <li>Suggested that in Appendix B pages 125 – 126 mention could be made of the policy paper Water stressed areas: 2013 classification and on pages 135 -137 The Building Regulations &amp;c. (Amendment) Regulations 2015, specifically Amendment 2 (8) could be mentioned.</li> <li>Stated that in Appendix B on page 143 the South East Water Water Resources Management Plan 2014 has been superseded by The South East Water Water Resources Management Plan 2019.</li> </ul>	<p>The plans and programmes will include the latest WRMP (2019) published in December 2019.</p> <p>Defra’s Water stressed areas: 2013 classification and The Building Regulations &amp;c. (Amendment) Regulations 2015 (with only specific reference to water efficiency measures) will also be included.</p>
	8 (Water: Flooding, Quality and Resources)	<p><b>Flood Risk</b></p> <ul style="list-style-type: none"> <li>Considered that the issue of flood risk has been adequately identified within the Scoping Report.</li> <li>Suggested that reference to Strategic Flood Risk Assessment (SFRA) is included within the Scoping Report. Highlighted the importance of using the latest modelling data available, including appropriate climate change allowances.</li> </ul>	<p>Support for coverage of flood risk welcomed. The Canterbury City Council Strategic Flood Risk Assessment is referenced within the Section 8 baseline footnotes a number of times. However, a specific reference is now included in the text.</p>
	5 (Climate Change, Adaption and Mitigation)	<p><b>Water Quality</b></p> <ul style="list-style-type: none"> <li>Stated that the Scoping Report should provide more detail on potential environmental impact from development and how this would be mitigated. Highlighted that Section 5 (Climate Change, Adaption and Mitigation) mentions water shortages, but that it is not mentioned as a key sustainability issue and that the effects of climate change on water availability for human and environmental requirements should be considered.</li> <li>Stated that the effects of climate change on water quality should be investigated.</li> </ul>	<p>Disagreed. Section 8 notes “The need to manage and protect water resources in response to climate change, population growth and lifestyle choices.” within the key sustainability issues. This captures the cross-cutting theme of climate change within the Water section.</p>
	6 (Biodiversity)	<ul style="list-style-type: none"> <li>Stated that the effects of development on Biodiversity, particularly on internationally designated sites, should be considered and stated that this was directly linked to Section 8 (water).</li> </ul>	<p>Comment noted. The potential for effects on biodiversity are considered within Section 6. Enhanced reference to the importance of water to some designated sites is now included in the baseline.</p>
	8 (Water: Flooding, Quality and Resources)	<ul style="list-style-type: none"> <li>Stated that Section 8 (water) alludes to three separate issues (flooding, quality and resources) but does not expand on how they may be impacted, highlighting the following examples:</li> <li>The report identifies that “large portions” of the area for development are within a flood zone, yet there is no mention of the potential impact of development on wastewater networks in the area and how this may interact with surface water flooding (e.g. use of CSOs);</li> <li>There is no consideration of receiving WWTWs and the ability / lack thereof to treat an increase in received flows to the required level;</li> <li>National Nature Reserves such as the SSSI Stodmarsh are mentioned, but no consideration of the impact that changes in water quality due to the development may have on these areas (related to point b above).</li> </ul>	<p>Agreed in part. Enhanced reference to the need for the commensurate capacity of wastewater works to meet development needs has been added to the baseline in Section 8. Changes to baseline in Section 6 have identified the link between certain designated conservation sites and the impact of water quality.</p>
	15 (Sustainability Appraisal Framework)	<ul style="list-style-type: none"> <li>Stated that although sustainable water is included under Objective 6 of the Sustainability Appraisal Framework, it should also be included under Objective 2 (‘To reduce the causes and adverse impacts of climate change and promote energy efficiency’) so that sustainable water use is given the same level of importance as other issues.</li> <li>Highlighted that a number of items are linked, such as climate change, biodiversity, water quality and water resources, so water quality should be mentioned in all relevant areas so that it is not considered in isolation to other issues.</li> </ul>	<p>The SA Framework does not set a hierarchy of importance for the objectives. The objectives are considered separately but where cross cutting themes are apparent, they will be considered. Objective 6 explicitly seeks “To protect water resources and ensure a high quality of inland and coastal waters”. It is considered this adequately and proportionately covers the issues of water resource</p>

				and quality and allows for meaningful appraisal. Sub-Objective 6.3 explicitly seeks to: "Promote the sustainable and efficient use of water resources".
		Appendix A (Possible Indicators)	<ul style="list-style-type: none"> <li>Expressed concern that Appendix A advises that the Local Plan needs to consider items such as reducing water pollution, management of wastewater treatment and policies to protect water quality and resources, but that these issues are not mentioned in the main body of the Scoping Report.</li> </ul>	Agreed. Additional reference to the need to provided wastewater treatment works capacity is included in the baseline. The need for provision of capacity at WwTW commensurate with new development is a Key Sustainability Issue.
		6 (Biodiversity)	<ul style="list-style-type: none"> <li>Stated that the following key sustainability issue in Section 6 (Biodiversity) of the Scoping Report should be amended so that it no longer includes the word "Attempt": "<i>Attempt to achieve biodiversity net gain to improve the environment including through the long term enhancement and creation of well-connected, functional habitats.</i>" because the current wording lacks ambition and fails to deliver on a statutory duty as set out in the NPPF (Paragraph 170 section d).</li> </ul>	Agreed. Remove reference to 'attempt' within the key sustainability issues.
22	Highways England	General Comments	<ul style="list-style-type: none"> <li>Recognised that the plan making process is iterative and welcomed the opportunity to participate in it.</li> </ul>	Comment noted.
		General Comments	<ul style="list-style-type: none"> <li>Stated that, mindful of the Duty to Co-operate and national planning and transport policy in the NPPF and DfT C2/13, the transport evidence base needs to consider the impacts on and of the Local Plan from events, developments and plans from within and beyond its boundaries.</li> <li>Stated that the transport modelling should consider how far beyond the administrative boundary it should cover in order to pick up the key current and future trip generation, origins and flows. Advised that depending on the location of the modelling cordon, this may in turn affect other aspects of the SEA/SA work.</li> </ul>	Comments noted. The comments primarily relate to Local Plan review evidence and will be considered during its preparation. The SA will reflect evidence pertaining to transport modelling prepared to support the Local Plan.
		General Comments	<ul style="list-style-type: none"> <li>Stated that the evidence base will need to cover as a minimum the full period from now until the end of the plan period, which should be a minimum of 15 years from the date of adoption. Stated that if the council is contemplating major development such as new settlements that will be delivered over a longer period, the evidence base should provide evidence to cover the full build out period. Advised that this may impact on other aspects of the SEA/SA work.</li> </ul>	Comments noted. The comments primarily relate to Local Plan review evidence and will be considered during its preparation. The SA will reflect evidence pertaining to the transport evidence prepared to support the Local Plan.
		General Comments	<ul style="list-style-type: none"> <li>Stated that where suboptimal locations or distributions of developments, in transport terms are required for other purposes such as environmental or historic designations, the evidence base will need to show clearly how alternatives were assessed and final decisions made.</li> <li>Stated that if the council intends to rely on development coming forward through windfalls, it will need to provide evidence of their likely distribution so that the transport implications can be assessed and mitigated accordingly.</li> </ul>	Comment noted. The comments relate to the contents of the Council's new Local Plan, rather than the SA, and will be noted by the Council and considered during the plan making process.
		General Comments	<ul style="list-style-type: none"> <li>Highlighted that transport modes/technology/use is rapidly changing and will continue to do so. Requested that the Council is ambitious but realistic with regard to their transport related plans and evidence base. Highlighted that they are open to innovative means to model and assess transport impacts and the means by which they are mitigated but advised that the further from a standard traditional approach they are, the more the assumptions and implications will need to be understood and the more the council will need to have a Plan B in place in case things don't occur as forecast.</li> </ul>	Comment noted. The comments relate to the contents of the Council's new Local Plan, rather than the SA, and will be noted by the Council and considered during the plan making process.



			<ul style="list-style-type: none"> <li>Advised that they remain open to how changes in transport technology may assist in addressing air or noise pollution, however, the view of other statutory consultees would need to be fully understood before agreeing to any proposals.</li> <li>Stated that where modal shift is being sought via increased use of bus or rail, robust evidence that such shifts are viable, and deliverable will need to be provided. For example, can areas around stations accommodate increased use and can platforms accommodate the trains or will there need to be improvements to and around stations and more train capacity introduced. Advised that evidence from those responsible for rail services will be required if it is to be relied upon.</li> </ul>	
		General Comments	<ul style="list-style-type: none"> <li>Stated that to meet national policy, Local Plans should be appropriate, viable and deliverable and that to meet these tests, allocated sites will need to individually and cumulatively deliver all the necessary supporting infrastructure, including transport.</li> <li>Noted that the likes of the Roads Investment Strategy are intended to address the requirements of the SRN in terms of strategic movement rather than accommodate the impacts of localised change or development.</li> <li>Highlighted the strategic role of the A2 through Canterbury district in connecting the country to the Channel ports and stated that therefore Local Plan led development should be accompanied by Local Plan led transport mitigation, even if strategic and local schemes can be delivered as one project</li> </ul>	Comment noted. The comments relate to the contents of the Council's new Local Plan, rather than the SA, and will be noted by the Council and considered during the plan making process.
		General Comments	<ul style="list-style-type: none"> <li>Advised that at various points during the production of the evidence base, Highways England will need to sign off key stages/documents such as the modelling scope and baseline and stated that they wish for this to occur in a logical, timely and efficient manner. Suggested that a Statement of Common Ground can start to be produced from this, that can contain a diary of engagement and agreement throughout the process and can be submitted to the Local Plan examination.</li> </ul>	Comment noted. The comments relate to the development stages of the Council's new Local Plan, rather than the SA. The Council will engage with Highways England during the Local Plan preparation.
23	Historic England	11 (Historic Environment)	<ul style="list-style-type: none"> <li>Confirmed that the Scoping Report adequately covers the issues that may arise in respect of the proposed development sites on heritage assets.</li> <li>Highlighted that Historic England has prepared generic guidance with regard to their involvement in the various stages of the Local Plan Process (available from the Historic England Website) and suggested this may be helpful in preparing the Sustainability Appraisal.</li> </ul>	Support for SA Scoping Report welcomed.
24	Kent County Council	2 (Methodology)	<ul style="list-style-type: none"> <li>Stated that the Local Plan Review should ensure that the District remains an environmentally attractive and sustainable area that takes a pro-active approach to climate change.</li> </ul>	The comments will be considered as part of the Local Plan review.
		6 (Biodiversity)	<p><b>Key Sustainability Issue</b></p> <ul style="list-style-type: none"> <li>Stated that the Council should ensure that the Local Plan Review includes policies to ensure net gain in biodiversity is achieved in the District, in line with the requirements set out in the Environment Bill.</li> </ul>	The comments will be considered as part of the Local Plan review.
		7 (Landscape and Geology)	<p><b>Geology</b></p> <ul style="list-style-type: none"> <li>Highlighted that the Scoping Report identifies safeguarded mineral resources and Regionally Important Geological/Geomorphological Sites (RIGS) but does not provide any further understanding or explanation of the risk of sterilizing mineral resources.</li> </ul>	Agreed in part. SA Objective 4 seeks "To conserve geological sites and safeguard mineral resources within the District" with Sub objective 4.2 "Balance the need for development with safeguarding mineral resources and infrastructure". This provides the framework to appraise

			<ul style="list-style-type: none"> <li>Advised (as the Minerals and Waste Planning Authority) that an assessment should be carried out within the SA and SEA to assess development options against the safeguarding policies of the Kent Minerals and Waste Local Plan (KMWLP).</li> </ul>	<p>the likely significant effects on mineral resources. However, the baseline has been amended to include explicit risk of unnecessarily sterilising mineral resources.</p>
		8 (Water: Flooding, Quality and Resources)	<ul style="list-style-type: none"> <li>Recommended that the Council considers the Water for Sustainable Growth (WfSG) Study and engages further with the (Kent) County Council as the Lead Local Flood Authority.</li> </ul>	<p>Comment noted. The Council will continue to engage with the County Council as Lead Local Flood Authority and the Water for Sustainable Growth (WfSG) Study will be included as relevant to the baseline.</p>
		9 (Waste)	<ul style="list-style-type: none"> <li>The consideration of waste is welcomed.</li> <li>Noted that the Scoping Report considers the construction, demolition and excavation waste of new development and stated that the production and management of commercial, industrial and hazardous wastes in Canterbury district will need to be addressed and assessed in the production of the Local Plan Review.</li> <li>Highlighted that the Scoping Report does not reference the City Council’s waste management capacity and the waste facilities safeguarded by the Kent Minerals and Waste Local Plan (KMWLP) and will need to consider it in the Plan review.</li> <li>Stated that CCC will need to have consideration of the need to safeguard waste management facilities and the proximity of new development to these facilities when producing the Local Plan Review.</li> <li>Recommended that consideration should be given to how the Local Plan Review can contribute to net self-sufficiency in Kent, as this is a key element in delivering sustainable communities.</li> <li>Stated that the County Council would welcome further engagement with CCC regarding waste matters.</li> </ul>	<p>Support for consideration of waste is welcomed.</p> <p>The remaining comments relate to matters for consideration in the Local Plan review. The Council will consider these during preparation of the Local Plan and engage Kent County Council where required.</p>
		10 (Population and Human Health)	<ul style="list-style-type: none"> <li>Stated that Sport England Guidance should be considered as part of the Local Plan Review.</li> <li>Noted that Sport England’s strategies are focused on tackling inactivity and supporting/encouraging under-represented groups to be active and noted that the National Active Lives survey shows that nationally 25.1% of the population are inactive which can impact on physical and mental health and individual and social/community development. Stated that the Local Plan Review should address this issue and seek to provide a mix of formal and informal indoor and outdoor areas/spaces where people can be active.</li> </ul>	<p>The comments will be considered as part of the Local Plan review.</p>
		11 (Historic Environment)	<p><b>Current Baseline</b></p> <ul style="list-style-type: none"> <li>Advised that information regarding locally listed buildings (674 in total) was entered into Canterbury City Council’s Archaeological Database (UAD) a number of years ago and that it was possible that some buildings may have since been de-listed and stated that the County Council will confirm this statistic with CCC and recommended that the UAD be updated to ensure reliability.</li> </ul> <p><b>Future Baseline (Paragraph 11.5)</b></p> <ul style="list-style-type: none"> <li>Agreed that the Local Plan is important to reinforce the Heritage Strategy and prevent inappropriate development and noted that the Heritage Strategy seeks to ensure that the district’s heritage has a coherent role in improving life in the district e.g. through increasing tourism.</li> </ul>	<p>Comments on listed buildings noted. The Council will keep the SA baseline under review during preparation. Support for future baseline welcomed.</p> <p>The comments on the key sustainability issues are noted. The Council will work with Kent County Council and partners during the preparation of the Local Plan to ensure that the historic environment is considered fully in accordance with the evidence and requirements of national policy.</p>

		<p><b>Key Sustainability issues</b></p> <ul style="list-style-type: none"> <li>● Noted that the historic environment is crucial to ‘sense of place’ and can bring health and wellbeing benefits. Stated that the major historic environment issues that need to be taken into consideration are:                             <ul style="list-style-type: none"> <li>○ Design and layout of new development</li> <li>○ Building materials</li> <li>○ Protection and conservation of historic remains</li> <li>○ Incorporation of historic assets into leisure and cultural improvements</li> <li>○ Historic landscape</li> </ul> </li> <li>● Advised that the District’s historic parks and gardens will play an important role in the delivery of sustainable development due to their visual attractiveness and contribution to leisure, health and well-being. Advised that KCC and KGT have been working on a number of reviews of local data and would be happy to discuss and update for the District with CCC.</li> <li>● Noted that the District’s towns and villages sit within a historic and vulnerable landscape and stated that to understand that landscape character fully it is important to consider the historic aspect.</li> <li>● Highlighted that the Kent Historic landscape Characterisation (2001) has strategically identified the broad historic character of the landscape of Kent and advised that for this to be more useful at the local level it requires more detailed refinement. Stated that the County Council would welcome discussions with CCC on such a refinement project.</li> <li>● Noted that SuDS schemes may have impacts (direct and indirect) on the historic environment. Noted that archaeological remains are highly vulnerable to changes in moisture levels which can accelerate organic material decay and alter the chemical constituency of soils and that historic buildings are often more vulnerable to flood damage to their foundations. Advised that when SuDS are planned, the potential impacts on the historic environment must be fully considered and unavoidable damage must be mitigated. Stated that early consideration of local historic environment.</li> <li>● Stated that the historic environment has a significant role to play in the conservation of resources required for development and in energy efficiency as existing older buildings can be adapted for modern needs using fewer resources than demolishing and rebuilding and can also often be more energy efficient than newer buildings.</li> </ul>	<p>The SA Framework includes Objective 9 with a range of sub-objectives to appraise the effects of the emerging Local Plan on the historic environment.</p>
	12 (Housing)	<ul style="list-style-type: none"> <li>● Highlighted the need to provide housing for older and disabled people as set out in the MHCLG guidance: ‘Housing for older and disabled people’ (2019) and that accessible and adaptable housing enables people to live more independently, safely and conveniently.</li> <li>● Requested that Accessible and adaptable dwellings be built to Building Regulation Part M4(2) standard to ensure they remain accessible throughout the lifetime of the occupant and meet any changes in the occupant’s requirements.</li> </ul>	<p>Comment noted. The comments made that relate to the Local Plan review, rather than the SA, will be noted by the Council and considered during the plan making process.</p>
	14 (Transport)	<ul style="list-style-type: none"> <li>● Stated that the County Council will support CCC with the preparation of a Validated Base Condition Assessment and is eager to work with CCC to build a full understanding of transport opportunities and constraints within the district. Acknowledged that whilst the data provided shows a high proportion of walking to work in the district it was recommended that further statistical evidence on commuting flows be developed to enable identification of demand and appropriate mitigation.</li> </ul>	<p>Comment noted. The comments made that relate to the Local Plan review, rather than the SA, will be noted by the Council and considered during the plan making process.</p>

			<ul style="list-style-type: none"> <li>Requested that CCC consider the sustainable transport hierarchy and engage with key transport providers including the County Council to provide a range of accessible transport options to realise sustainable development opportunities as per Paragraphs 104 and 110 of the NPPF.</li> <li>Advised that whilst the base traffic flows provided for the 6 key routes into the City Centre are a useful indication, it may not account for localised increased use of minor roads to avoid congestion.</li> <li>Advised that the County Council will work with CCC to ensure additional base traffic data is available, so there is a robust evidence base.</li> <li>Advised that Kent County Council's Active Travel Strategy will be a useful document in terms of delivering key sustainable issues.</li> </ul>	The County Council's Active Travel Strategy is included in review of plans and programmes.
		14 (Transport)	<ul style="list-style-type: none"> <li>Advised that Kent County Council's Public Rights of Way and Access Service is eager to work with CCC to achieve the aims of the County Council's Rights of Way Improvement Plan (ROWIP). Advised that the ROWIP should be evidenced in the Local Plan Review as it is a strategic policy document for PRoW protection/enhancement.</li> <li>Stated that the PRoW is important for linking towns to the countryside and providing opportunities for travel, tourism and recreation and that the Local Plan Review should consider how PRoW will be protected and improved by developments and how existing PRoW can be retained on existing alignments or diverted if new routes can be created in appropriate locations.</li> <li>Stated that the Scoping Report should consider improvements to equestrian access provision within the district. Highlighted that research has shown a shortage of higher right use PRoW in Kent, with limited off-road equestrian routes compared to the national average and advised development of high quality equestrian access resource could bring economic benefits and address safety concerns.</li> <li>Stated that consideration should be given to the impacts of development on Non Motorised Users (NMUs) on rural lanes as rural lanes provide key connections for NMUs and new developments are likely to increase traffic on these routes, raising safety concerns for NMUs who may be deterred from using these routes and PRoW. Suggested that a Rural Lanes Policy is considered to ensure that the use of rural lanes by NMUs is not adversely affected by development.</li> </ul>	<p>Comments noted. The Local Plan review will consider the protection of PRoW in the District.</p> <p>A reference to the PRoW network has been included in the baseline section with clear reference to the shortage of higher right user PRoW, and equestrian access.</p>
		15 (Sustainability Appraisal Framework)	<ul style="list-style-type: none"> <li>Stated that PRoW should be considered under Objectives 13 '<i>To promote and encourage sustainable transport</i>' and Objective 14 '<i>To promoted safe, healthy, inclusive and sustainable communities</i>' in Table 17 (SA Framework) of the Scoping Report as the PRoW network provides opportunities walking, cycling and equestrian activities which can have health, economic and environmental benefits. Recommended that PRoW are included in the choice of travel options available for sustainable growth in promoting active travel patterns and encouraging modal shift.</li> <li>Stated that new developments must provide high quality access infrastructure with links to local amenities and the PRoW and Access Network.</li> <li>Supported the adoption of the proposed transport hierarchy that prioritises pedestrian and traffic movement and stated that high quality, traffic-free walking and cycling routes integrate effectively with the wider transport and should provide realistic travel alternatives to short distance car journeys, providing direct, convenient access. Stated that the Local Plan Review should encourage transport modal shift towards walking and cycling.</li> </ul>	<p>Comments noted. The comments largely refer to matters that must be addressed in the Local Plan review. However, reference to the PRoW network has been included in the baseline section.</p> <p>It is considered that the SA Framework supports the promotion of sustainable transport measures within SA Objective 13 and no changes are required.</p>

			<ul style="list-style-type: none"> <li>• Advised that increasing active travel participation would help to reduce congestion on roads, address air quality issues and improve public health and well-being. Suggested that consideration should be given to access and movement requirements across the district.</li> <li>• Advised that a high-quality transport network that enables the public to move around quickly and easily is an essential requirement for economic growth and prosperity and that the PRoW network can support public transport and the wider highway network.</li> <li>• Recommended that CCC considers how the Local Plan Review could protect and improve open spaces, sports facilities and recreational facilities and advised that improved connectivity should encourage recreational and leisure activity, including access to country parks and other high leisure facilities. Stated that CCC should consider the provision of safe and convenient pedestrian and cycle access, connecting communities safely and design to increase a sense of place and ownership.</li> <li>• Highlighted that Kent County Council is currently working with Natural England to establish the England coast path to this region, which includes new public access rights and brings new tourism opportunities. Stated that consideration should be given to enhancing links between the national trail and surrounding area.</li> </ul>	
25	Natural England	General Comments	<ul style="list-style-type: none"> <li>• Welcomed early engagement on the Local Plan review and stated that they looked forward to working with the Council as the plan progresses.</li> </ul>	Support for engagement welcomed.
		6 (Biodiversity)	<ul style="list-style-type: none"> <li>• Stated that ancient woodland should be included in the hierarchy of sites. Highlighted that ancient woodland is a nationally important habitat that Canterbury has an important resource of.</li> <li>• Stated that ancient woodlands are key biodiversity sites and their protection from loss and deterioration through the Local Plan and clear targets for their enhancement, should be a clear principle in the SA and SEA.</li> <li>• Stated that ancient woodland should be mapped in the biodiversity section of the Report. Stated that opportunities to strategically enhance ancient woodland and increase connectivity should be secured in the Plan.</li> </ul>	Agreed. Ancient woodland is referenced in the baseline (presented in paragraph 7.6 of the SA Scoping Report) and mapped (Map 11). However, an additional cross reference to the importance of ancient woodland as biodiversity sites has been included in the section concerning biodiversity.
		8 Water: Flooding, Quality and Resources	<ul style="list-style-type: none"> <li>• Stated that as Canterbury has coastal areas and key riverine habitats, robust and resilient mechanisms and indicators of these will be needed in place to account for climate change and water quality and quantity will be required.</li> <li>• Highlighted that there is evidence that shows the harmful effects of Nitrogen and Phosphorus nutrient enrichment on habitats within the Stodmarsh SAC SPA Ramsar Site and SSSI and that some of the lakes within the Stodmarsh are failing their water quality targets and that new growth could further deteriorate the Stodmarsh site.</li> <li>• Highlighted that the Wastewater Treatment Works that discharge into the River Stour and surrounding areas are subject to investigation into the potential impacts and connection with Stodmarsh designated site under the Environment Agency Water Industry National Environment Programme (WINEP), that will report in 2022, and that until this work is complete, it cannot be ruled out on objective evidence that new development, including housing, mixed use and tourist development including EIA development within the Stodmarsh catchment or connected to the Wastewater Treatment works that discharge into the catchment, will not contribute to a likely significant effect on the site.</li> </ul>	The comments are noted. The issues will be considered as part of preparation of the Local Plan review. The findings of the separate Habitats Regulations Assessment (HRA) will be taken into account in the SA where relevant.

			<ul style="list-style-type: none"> <li>Stated that Natural England will continue to work with the Council as the matter progresses and that a strategic approach to mitigation for this issue, secured through the Local Plan Review, would be welcomed and therefore that this issue could be captured in the objective for water quality, with a suitable target attributed.</li> </ul>	
		15 (Sustainability Appraisal Framework)	<ul style="list-style-type: none"> <li>Suggested that Objective 2 should be strengthened to account for Canterbury County Council's declaration of a Climate Emergency by referencing 'resilience' so that the objective would read: 'To ensure resilience to the impacts of climate change by reducing the impacts of climate change and planning for species adaptation and migration across the County whilst promoting energy efficiency', which would encompass the suite of impacts and requirements for planning for climate change.</li> </ul>	Agreed in part. However, it is considered that these matters would be better addressed under SA Objective 3 which has been revised to include a sub-objective (3.5) on " <u>Support species adaptation and migration to reduce impacts of climate change and ensure resilience</u> "
		Indicators	<ul style="list-style-type: none"> <li>Advised that although levels of carbon dioxide and reduction in emissions are important indicators, climate change must not be considered only in terms of energy efficiency and reduction in emissions but also include land use planning for changes in water levels for example over the plan period. For example, identifying /safeguarding areas around the floodplain to accommodate changes in water levels over the Plan Period. Stated that this could be linked to statutory sites.</li> </ul>	To provide greater clarity with regards to Objective 2 it is proposed to amend this to read: " <u>To minimise greenhouse gases that cause climate change and deliver a managed response to its effects</u> ". It is recognised that promoting energy efficient buildings is captured under Sub objective 2.2. However, it is considered that considering the mitigation/adaptation allows for assessment of policies/proposals on climate change in the round and that a split of the objective is not required.
		Indicators	<ul style="list-style-type: none"> <li>Objective 3 was welcomed and the inclusion of connecting biodiversity across the district was supported. Noted that net gain has been included as a sub-objective and advised that it is a key requirement that is readily quantified.</li> <li>Advised that the SA includes a target for a measurable uplift in net gain across the District and referred to the requirement for net gain set out in the NPPF that Plans should "...identify and pursue opportunities for securing measurable net gains for biodiversity" (Paragraph 174 (b))</li> <li>Advised that targets for changes in the areas and composition of protected areas should be strengthened by including protected and irreplaceable habitats and that the target should be no loss or deterioration of these key habitats (such as ancient woodland) and referred to policy within the NPPF (paragraph 175 (c)) for the protection of such habitats.</li> </ul>	Support welcomed. Additional indicator added: " <u>Achievement of no loss or deterioration of key habitats</u> ".
		Objectives	<ul style="list-style-type: none"> <li>Sub-objectives 3.3 and 3.4 were welcomed and it was stated that the improvement of non-designated areas including irreplaceable habitats, are key in order to achieve net gains in biodiversity and increase resilience through Canterbury.</li> </ul>	Support welcomed.
		Indicators	<ul style="list-style-type: none"> <li>With regard to Objective 4 it was advised that an indicator pertaining to loss and damage of geologically important sites should not be included, and that the Local Plan should include measures to avoid and mitigate damage with loss as a last resort, as this is a requirement of the mitigation hierarchy in the NPPF.</li> </ul>	Comment noted. However, the retention of the indicator would allow assessment of the effects should loss take place, even though this is clearly not the outcome desired



		Baseline/ Appendix B	<ul style="list-style-type: none"> <li>Highlighted that the Kent Downs AONB is within the Councils area, and that AONBs are of national importance and protected under the NPPF (Paragraph 172) alongside National Parks and the Broads. Advised that protection of these sites should be incorporated into the SA and indicators should include how the execution of the plan will lead to the conservation of nationally important landscapes.</li> <li>Advised that the Scoping Report should include the Kent Downs AONB and that the AONB Management Plan should be referenced.</li> </ul>	Comments noted. SA Sub-Objective 5.1 “Conserve, protect and enhance protected sites in accordance with the protection hierarchy (i.e. international, national or locally designated)” and the possible indicators table (Appendix A) outlines the multitude of sources for monitoring information. The Kent Downs AONB Management Plan is already included in the plans and programmes review.
		Objectives	<ul style="list-style-type: none"> <li>Acknowledged that Objective 6 is a key objective as Canterbury lies close to the coast and contains key waterbodies including Stodmarsh SPA SAC Ramsar Site and SSSI. Advised that Natural England will continue to work with the Council regarding impacts on the Stodmarsh SPA SAC Ramsar Site and SSSI.</li> <li>Noted that part of the Stodmarsh SPA SAC Ramsar Site and SSSI are currently failing for nutrient enrichment and that there is a WINEP investigation underway to determine a link between the water quality in the river Stour and the site and therefore indicators should include condition of protected sites and could also include the implementation of strategic measures to insure the Stodmarsh SPA SAC Ramsar Site and SSSI is protected through the Local Plan.</li> <li>Noted that the provision of SuDS is included under Objective 6 and advised that this would be key for applications that impact on Stodmarsh and have wider benefits for addressing climate change.</li> </ul>	<p>Comments noted. They relate to the preparation of the Local Plan and will be considered going forward.</p> <p>The SA will report on the effects on designated sites as informed by the HRA.</p>
		Objectives	<p><b>Water Quantity</b></p> <ul style="list-style-type: none"> <li>Advised that a key target for Canterbury should be the implementation of a target maximum usage of 110 litres/day to address the limited water resources of the region.</li> <li>Expressed strong support for Objective 7 and suggested that this should be linked to measures for climate change adaptation.</li> <li>Advised that development should be away from areas at risk of flooding and erosion and areas should be targeted for safeguarding through the Plan process to allow for resilience with climate change and changing water levels and resources and suggested that this should be included as a target.</li> </ul>	Comment noted. The introduction of ‘optional’ technical standard of 110 l/pp/pd is a matter for the Local Plan to address. SA Sub-Objective ‘6.3 Promote the sustainable and efficient use of water resources’ allows the likely significant effects on water efficiency to be assessed.
26	Nicholas Thurston	1	<ul style="list-style-type: none"> <li>Suggested that the highest priority plan within Chapter 3 and Appendix B of the Scoping Report should be a District Climate and Ecological Emergency Response Plan.</li> <li>Stated that the District Climate and Ecological Emergency Response plan, and therefore the new Local Plan, must be guided by the Special Report on Global Warming of 1.5 °C (SR15) Summary for Policymakers published by the Intergovernmental Panel on Climate Change (IPCC) (2018) and Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) Global Assessment Summary for Policymakers (2019).</li> <li>Highlighted that the UN guidance for policy makers in SR15 supersedes the older references in Appendix B of the Scoping Report.</li> <li>Advised that where older reports are listed in Appendix B of the Scoping Report, there needs to be a clear reason for them to be included.</li> </ul>	<p>Currently there is not a District Climate and Ecological Emergency Response Plan in place for the district of Canterbury. However, a number of key plans, policies and programmes relating to climate change, adaptation and mitigation at the international and national level have been reviewed in Appendix B as part of the production of the SA Scoping Report and have helped to develop the SA Framework that the Local Plan Review will be assessed against.</p> <p>The Special Report on Global Warming of 1.5 °C (SR15) Summary for Policymakers published by the Intergovernmental Panel on Climate Change (IPCC) (2018)</p>



			<ul style="list-style-type: none"> <li>Advised that historic carbon reduction targets which have now been superseded by the Canterbury City Council Climate Emergency net zero carbon emissions for 2030 target should not be included as this creates confusion.</li> </ul>	<p>and Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) Global Assessment Summary for Policymakers (2019) have been reviewed and included in the review of plans and programmes. Superseded reports have been revised/removed where necessary.</p> <p>The relevant targets to reduce the Council’s own carbon emissions, as part of the Climate Emergency declaration, have been included in the baseline.</p>
		2a	<ul style="list-style-type: none"> <li>Stated that the baseline data should also include peak concentrations in addition to the daily average, using the data collected from the work of local residents’ groups.</li> <li>Suggested that the data collected by the work of Stephen Peckham should be included.</li> </ul>	<p>The SA Report will rely on robust, verified evidence on air quality such as that contained within the 2019 Air Quality Annual Status Report (ASR) (and any future updates) to determine likely significant effects on achievement of SA Objective 1. No change required; although any additional data such as that referenced by the submission will be reviewed when SA is undertaken of the iterations of the draft Local Plan, to ensure the plan is based on up-to-date evidence.</p>
		2b	<ul style="list-style-type: none"> <li>Highlighted that the future baseline section essentially says that air quality will get worse and not a great deal will be done to address it. Suggested that instead the Scoping Report should state that for sustainable public health, all AQMA must be converted to Low Emission Zones with the utmost urgency within the Local Plan.</li> </ul>	<p>Disagreed. This section represents the future baseline scenario of air quality in the district without a Local Plan in place and therefore this is why it shows that air quality would worsen and why little action would be taken to address it, as there would be no Local Plan policies in place to support a reduction in air pollution and increase in air quality.</p>
		3a	<ul style="list-style-type: none"> <li>Suggested that additional datasets providing the postcode area level trends in electricity and gas usage should be included, advising the use of BEIS Sub-National Level Electricity and Gas Consumption Statistics.</li> <li>Stated that a focus on the postcode area within the district would allow greater transparency of the energy performance of each District area and allow the Local Plan to make more informed sustainability decisions about any development plans.</li> <li>Stated that the number of properties connected to the gas network must be reduced year on year with no new homes connected to the gas network from 2025 (with reference made to Committee for Climate Change guidance) and suggested that BEIS data on gas connections should be used to track year on year progress and inform the Local Plan.</li> </ul>	<p>The SA Scoping Report includes data on the consumption at local authority level within Section 5. This is considered proportionate to the Local Plan. The inclusion of postcode level data is not considered appropriate for the SA to determine the likely significant effects of policies and proposals.</p> <p>The need to address climate change, ensure that CO2 levels are reduced, promote sustainable forms of energy and become as energy efficient as possible are all recognised as key sustainability issues within the SA Scoping Report as supported by Objective 2 of the SA Framework.</p>



				No change required.
		3b	<ul style="list-style-type: none"> <li>Stated that consumption is a major component of the causes of climate change and is missing from the Climate Change section of the scoping report. Highlighted that consumption of goods (and associated emissions related to production, transport, use and disposal) is responsible for roughly a third of carbon emissions in the district and stated that the Local Plan must incorporate measures to facilitate the reduction of District consumption by unlocking barriers to sustainable living.</li> </ul>	The comments regarding consumption relate to issues that the Local Plan should address and how these can be monitored. These will be considered in preparation of the Local Plan. Section 5 includes baseline data on energy consumption. The SA Framework that will be used to assess the sustainability of the Local Plan, includes an objective (SA Objective 2) relating to the reduction of the causes of the adverse impacts of Climate Change. No changes are required.
		10a	<ul style="list-style-type: none"> <li>Suggested that the following data could further inform the baseline analysis:                             <ul style="list-style-type: none"> <li>Number of empty dwellings</li> <li>Number of families housed in temporary social housing</li> <li>Length of the council housing waiting list</li> </ul> </li> </ul>	Agreed in part. Section 12 of the SA Scoping Report sets out an overview of the housing baseline including the percentages of home ownership, shared ownership, social rented, private rented and living rent free and affordable housing completions. It is considered that this provides evidence about the mix of housing types in the district that is proportionate for the SA. However, it is considered that empty dwellings would be useful baseline information and has been added to Section 12, as relevant to effective re-use of existing underutilised housing stock.
		12a	<ul style="list-style-type: none"> <li>Highlighted that commuting to school and work is the largest source of transport activity in the district and is a significant cause of the congestion, air quality and greenhouse gas emissions problems.</li> <li>Suggested that an annual survey of residents regarding how they live, including how they travel to work and school is an important source of information to enable evidence-based planning and if this data source does not already exist, then it should be put in place.</li> </ul>	<p>The SA Scoping Report highlights the need to reduce the amount of people travelling to work by car and encouraging sustainable modes of transport in line with the sustainable transport hierarchy as key sustainability issues. The travel to work presented in the SA Scoping Report is based on the most up to date ONS Census data (2011 Census) and is currently the most up to date version of this data available, until the 2021 Census takes place.</p> <p>The collection of travel to work and school data through an annual survey of residents is not considered necessary, proportionate or practical for development of the Local Plan or for inclusion within the SA to monitor if significant effects are likely. No changes required.</p>
		12b	<ul style="list-style-type: none"> <li>Stated that the current Council Sustainability Strategy 2017 (2014-2031) is not fit for purpose, noting that the planned expenditure on road development and car parking is six times the total planned expenditure on sustainable transport solutions and the plan will fail to deliver air quality targets, District transport modal shift targets and fail to reduce emissions to meet UK national targets.</li> <li>Stated that the framework should acknowledge that the Canterbury City Council Transport Strategy 2017 needs reconsideration.</li> </ul>	<p>Comment noted. A number of comments made that relate to the Local Plan and the Transport Strategy, rather than the SA or Local Plan.</p> <p>The key sustainability issues identify the need to encourage sustainable transport in the order of the</p>

			<ul style="list-style-type: none"> <li>• Stated that in addition to quoting figures as percentage increases and decreases, absolute numbers of journeys and where available average distance should also be quoted as these are also significant in informing policy.</li> <li>• Stated that the cycling strategy for Canterbury District needs a rethink if it is to achieve significant modal shift for journeys under 5 miles as per the transport strategy.</li> <li>• Stated that paragraphs 14.2 – 14.4 of the Scoping Report regarding cycling conflate cycling for leisure and cycling as a mode of daily transport.</li> <li>• Suggested that the rapid implementation of low-cost on road cycle lanes ubiquitously within the 5 mile radii of the district conurbations in conjunction with lower urban speed restrictions and culture-changing campaigns is a practical short-term solution.</li> </ul>	<p>sustainable transport hierarchy and to ensure that the provision of sustainable transport is in the appropriate location, quantity and standard to encourage mode shift as well encouragement of investment into transport infrastructure to increase choice and reduce congestion as supported by Objective 13 of the SA Framework.</p> <p>The baseline in Section 14 includes data on cycle routes and daily usage and is considered proportionate. Encouraging sustainable transport through the promotion of walking and cycling routes and park and ride is considered a key sustainability issue for the City as supported by SA Objective 13.</p>
	13		<ul style="list-style-type: none"> <li>• Stated that Objective 2 should be amended to separate out causes and impacts as objectives, this is because reducing the causes of climate change (from development) is a separate issue to protecting development from the impacts of climate change.</li> <li>• Stated that there must be an immediate and continuous reduction in emissions from the construction and operation of buildings and the associated consumption, transport and other infrastructure from all developments in order to meet regional, national and global emissions reduction targets.</li> <li>• Advised that resilience and adaption measures for the impacts of climate change are more site and development specific, and these different aspects of cause and effects of climate change must not be conflated into a single measure. Stated that <i>'Promoting energy efficiency'</i> is an element within <i>'reducing the causes of climate change'</i></li> <li>• Provided a suggested approach for the splitting of Objective 2 as set out above:             <ul style="list-style-type: none"> <li>◦ <i>Objective 2a - To Reduce the causes of climate change</i> <ul style="list-style-type: none"> <li>• <i>Sub Objective 2a.1 – Minimise greenhouse gas emissions due to constructing the development</i></li> <li>• <i>Sub Objective 2a.2 – Minimise greenhouse gas emissions due to operating the development over its lifetime</i></li> <li>• <i>Sub Objective 2a.3 – Minimise greenhouse gas emissions due to the location of the development with respect to consumption and transport</i></li> <li>• <i>Sub Objective 2a.4 – Inclusion of renewable energy generation within the development</i> <ul style="list-style-type: none"> <li>◦ <i>Objective 2b - To reduce the impacts of climate change</i> <ul style="list-style-type: none"> <li>• <i>Sub-objective 2b.1 – Increase resilience to the impacts of climate change'</i></li> </ul> </li> </ul> </li> </ul> </li> <li>• Considered that the SA assessment framework matrix in tables 18 and 19 under Paragraph 15.9, suggest a simplistic and subjective evaluation mechanism</li> <li>• Asserted that addressing the causes of climate change is non-negotiable and the embodied and operating emissions of developments can and should be estimated from the scale of and standard to which the development will be constructed and this should be expressed in tonnes of carbon dioxide equivalent emissions over the lifetime of the development so that the proposed Plan can be compared to the district emissions reduction plan.</li> </ul> </li></ul>	<p>Agreed in part.</p> <p>To provide greater on clarity with regards to Objective 2 it is proposed to amend this to read: <u><i>"To minimise greenhouse gases that cause climate change and deliver a managed response to its effects"</i></u>. It is recognised that promoting energy efficient buildings is captured under Sub objective 2.2. However, considering the mitigation/adaptation allows for assessment of policies/proposals on climate change in the round and that a split of the objective is not required.</p> <p>It is considered that Sub-Objective 2.1 would allow appraisal of the range of issues highlighted by the respondent (emissions related to construction, operation, consumption and transportation) and no changes are proposed.</p> <p>With regards to weighting of SA Objectives - the Objectives are not weighted and aspects of the social, economic and environmental are treated equally as is required by the SEA Directive (in order to identify all likely significant effects of the Local Plan).</p>

			<ul style="list-style-type: none"> <li>• Suggested that the relative weighting of SA Objectives be published as some areas such as community health, air quality and climate change should have a higher relative weighing than others, such as encouraging investment.</li> </ul>	
		14	<ul style="list-style-type: none"> <li>• The indicator for Sub-objective 2.1 – ‘CO2 levels’ should be clarified as “<i>Annual greenhouse gas emissions for the district</i>”</li> <li>• Sub-objective 2.2 should include indicators for other lead measures of the square metres of development approved by year by the building standard applied (e.g. 2019 400,000sqm approved at BREEAM level excellent)</li> <li>• Sub objective 2.3 have an indicator of the measure of the KWh annual renewable generation within the district</li> <li>• Tangible measures of the area of land with high biodiversity status (Objective 3) gained each year within the district and/net tree gain should be measured and published.</li> </ul>	<p>Agreed in part. The monitoring indicators will be refined through the Local Plan preparation and SA process up to adoption of the Local Plan. The SA is an iterative process at each stage of preparation. SA Sub-Objective 2.1 indicator has been revised to state “<u>Annual greenhouse gas emissions</u> (CO2 levels)”. The monitoring information for CO2 is readily available, however, the data sources for other greenhouse gas emissions may become more widely available and these will be considered through future iterations of the SA. With regard to Sub-Objective 2.2 indicators it is proposed to include “<u>Development meeting high levels of energy efficiency (e.g. BREEAM excellent rating)</u>” however further consideration will be required as to data available to monitor this. Sub-Objective 2.3 indicator has been amended to read “Renewable Energy sites (<u>installed capacity</u>)”. It is considered that the range of potential indicators for SA Objective 3 are already appropriate.</p>
		15	<ul style="list-style-type: none"> <li>• Expressed concern that the framework will continue to permit and enable too much unsustainable development and not enable enough radical change to meet the United Nations instructions for systematic change.</li> </ul>	<p>Comment noted. The SA Framework will support the assessment of likely significant effects of the Local Plan based on baseline evidence and key sustainability issues for the District.</p>
27	Oaten Hill and South Canterbury Association	General Comments	<ul style="list-style-type: none"> <li>• Highlighted that the NPPF is clear that sustainability must be assessed at all levels in terms of robustness and health in three areas: economic, social and environmental, and stated that the Local Plan review discussed in the Scoping Report, neglects issues arising in the first and second categories in its overview of the district and focuses mainly on spatial strategies.</li> <li>• Highlighted that there is no comment on the existing policies of the existing Local Plan, in particular, the rate of housing commencements achieved since adoption, compared to the numbers predicted in the Plan.</li> <li>• Highlighted that the objectives in the Action Plan in Appendix A of the Scoping report are undated and unquantified. Stated that the Action Plan has little substance, and gives little guidance to future development, or commentary on solving Canterbury’s current problems, which is questionable when looking back to the controversy surrounding the production and examination of the Plan.</li> </ul>	<p>Comment noted. The overview sets out the broad summary of what the Local Plan will consider and its main elements.</p> <p>The SA Scoping Report sets out the baseline and method for assessing the Local Plan Review. The Council’s Authority’s Monitoring Report (AMR) sets out further detail on the housing commencements/completions since adoption of the current Local Plan.</p> <p>Appendix A sets out the SA Framework, which incorporates the objectives and possible indicators for</p>

				measuring them. The Local Plan Review will also incorporate a series of indicators and targets that will be monitored through the AMR.
		4 (Air Quality)	<ul style="list-style-type: none"> <li>• Questioned the finding that there has been a reduction in the exceedances of permitted air quality limits in 2016 – 2017 and suggested the Air Quality Monitoring Group’s figures be considered.</li> <li>• Considered that the conclusion in Paragraph 4.4 that the Local Plan contributes to keeping air pollution levels within permitted limits is a meaningless and false statement, stating that the large increase in house building permitted by the current Local Plan will contribute to increases in pollution and congestion levels in areas adjoining the ring roads and principal feeder roads to new estates.</li> <li>• Highlighted that the Scoping Report does not mention the declaration of a Climate Emergency by the Council, in terms of either setting lower targets, or the likelihood of containing and reducing pollution.</li> <li>• Stated that reference should be made to the ongoing Canterbury Ring Road review with Kent County Council and likely outcomes/ scope for improvements in the Action Plan.</li> </ul>	<p>The SA Report will rely on robust, verified evidence on air quality such as that contained within the 2019 Air Quality Annual Status Report (ASR) (and any future updates) to determine likely significant effects on achievement of SA Objective 1. No change required.</p> <p>The SA baseline has been revised to include reference to the Climate Emergency declared by the Council.</p>
		5 (Climate Change)	<ul style="list-style-type: none"> <li>• Considered it a positive step that the Scoping Report had a dedicated section for climate change, but considered it illogical that there’s no discussion of CCC’s warnings on the need for urgent action and the declaration of a Climate Emergency by CCC and therefore of any specific actions that need to be introduced.</li> <li>• Noted that regarding energy usage in Canterbury, table 20 states that it is lower than the South East and UK averages, but given that CCC’s Corporate Plan aims for growth, this presumably means that energy usage will rise, and questioned whether this was consistent with Climate Emergency goals.</li> <li>• Highlighted that Table 2 contradicts Figure 4 claiming a 38% decrease in CO2, and Table 3. Noted that there are no analyses of causes or quantified targets/plans.</li> </ul>	<p>Comments noted. The SA baseline has been revised to include reference to the climate emergency declared by the Council.</p> <p>The tables and figures reference draw on different information sources related to carbon emissions, energy consumption, energy generation, and renewable energy projects in the District. Due to the different focus of these datasets and the different sources it is recognised that direct comparisons cannot be drawn between.</p>
		6 (Biodiversity)	<ul style="list-style-type: none"> <li>• Highlighted that there was no mention of ongoing oyster farming off of Whitstable Beach and that this would be an example of how CCC intend to manage the balance between economic prosperity and other values, in this case amenity and leisure, in dealing with Marine Conservation Zones.</li> </ul>	The SA notes the Marine Conservation Zones and includes the need to not negatively impact biodiversity, and conserve and enhance biodiversity and protected sites as a key sustainability issue.
		7 (Landscape)	<ul style="list-style-type: none"> <li>• Noted that issues regarding house building in AONBs were not raised</li> </ul>	SA Objective 5 seeks to conserve and enhance landscapes, including designated landscapes.
		8 (Flooding)	<ul style="list-style-type: none"> <li>• Noted that sea level rise was not discussed</li> </ul>	The baseline (presented in paragraph 5.2) notes that sea level rise is a consequence of climate change.
		10 (Population)	<ul style="list-style-type: none"> <li>• Referred to comments made on section 5 (Climate Change) of the Scoping Report, regarding how population growth will affect other themes, how much growth is being sought and how this will be moderated by the Climate Emergency and noted that Canterbury is exhibiting 10% higher growth than Kent and 30% higher growth than the South East and the UK.</li> </ul>	The level of housing growth will be determined through the Local Plan process. The SA will appraise the level of growth and the reasonable alternatives.
		12 (Housing)	<ul style="list-style-type: none"> <li>• Noted that Table 12.3 provides the housing completion rates for the three most recent years, and setting aside the 2017-2018 year, the total figure of approximately 425pa completions is just over half of the 805 dwellings pa that the Local Plan demands. Stated that if this shortfall persists, the Plan will be in breach of its duty and CCC will be required to consent any residential schemes, regardless of unsuitability. Stated that this issue should have been discussed in the Scoping Report.</li> </ul>	The SA Scoping Report sets out the baseline for appraising the effects of the Local Plan review. The monitoring data shows that baseline and the effects of the Plan’s emerging policies and proposals can be assessed against. The SA

			<ul style="list-style-type: none"> <li>• Stated that the possible argument that the 2017 – 2018 314 exceedance of the required 805 completions partly redeems the shortfall is not acceptable as it is not considered that there has been a link between the completions of student housing and the release of general housing on the market and the 2017 – 2018 figures seemed to be an outlier.</li> <li>• Highlighted that Table 11 shows the poor numbers of Affordable Housing completions, particularly that there have been zero for social rented, which are the only practical dwellings that are accessible to that client group. Stated that affordable housing priced at 80% of market value is of no use when the median house price in Canterbury is 1000% of the median wage.</li> <li>• Noted that no projections or solutions are provided for this poor level of performance.</li> <li>• Stated that the Scoping Report should attempt a review of the likely effects of Brexit on the housing market, along with delays on other schemes (e.g. Mountfield Park urban extension).</li> </ul>	<p>does not have to provide commentary on the implications of missing delivery targets within the current plan.</p> <p>The key sustainability issues identify the need to provide sufficient housing to meet the needs of the District. The Local Plan process will determine those housing needs and a requirement to meet them. The SA will appraise the options and reasonable alternatives.</p>
		13 (Economy)	<ul style="list-style-type: none"> <li>• Queried the relationship between the Corporate Plan and the observed wage rates of the district. No detailed comments or plans are offered.</li> </ul>	<p>Comments relate to Corporate Plan. The Corporate Plan sets out the Council's broader vision, ambitions and objectives including supporting business growth. The current Corporate Plan is contained within the review of plans and programmes, and a review is being undertaken.</p>
		14 (Transport)	<ul style="list-style-type: none"> <li>• Highlighted that Paragraph 14.2 of the Scoping Report claims that there is a well-established cycle route network, and stated that this is only true for rural locations as there are no connected cycle paths in town areas, particularly within Canterbury. Stated that the sections of cycle track that do exist are interrupted at junctions and roundabouts stop on narrow sections of road and are comprised of poor surfacing and signage.</li> <li>• Highlighted that no commentary or planning is provided in the Scoping Report in response to the partial figures for modal shift in Paragraph 14.17 which only cover 2001 – 2011. A greater demonstration of understanding of the details figures and factors is required.</li> <li>• Acknowledged that it is positive that figures for the proportion of people walking to work are higher for Canterbury than the figures for Kent and the South East, but questioned why this is and stated that from experience this is because bus services run poorly, routes do not cover demand and it is expensive.</li> <li>• Stated that the review should indicate a review of the Canterbury District Transport Strategy, to bring it in line with the climate change and housing market factors that have emerged since it was written.</li> </ul>	<p>Comments noted. Paragraph 14.17 of the SA Scoping Report refers to Census data. The Census in 2021 will include new data on this and will be reflected in subsequent SA Reports should it be available during its preparation.</p> <p>Requiring a review of the Transport Strategy is beyond the scope of the SA but is something for the Council (in conjunction with Kent County Council) to consider separately.</p>
		15 (Sustainability Appraisal Framework) and Appendix A (Possible Indicators)	<ul style="list-style-type: none"> <li>• Considered that section 15 (Sustainability Appraisal Framework) and Appendix A (Possible Indicators) are generic and imprecise. Stated that they should indicate when proposals will be developed and within what criteria.</li> <li>• Disagreed with the inclusion of the UN Sustainability Objectives.</li> </ul>	<p>Disagreed. The SA Framework sets out how the Local Plan will be appraised against the range of sustainability objectives. The monitoring indicators are appropriate and proportionate to capture the range of effects of the Plan.</p>
28	Sturry Parish Council	General Comments	<ul style="list-style-type: none"> <li>• Welcomed that CCC had opened the Scoping Report consultation to neighboring local authorities and the public.</li> </ul>	<p>Support welcomed.</p>

	4 (Air Quality)	<ul style="list-style-type: none"> <li>• Acknowledged that the main source of air pollution is road traffic emissions on major roads</li> <li>• Agreed that AQMAs around Canterbury should be extended and new AQMAs should be declared, into and including Sturry.</li> <li>• Agreed with the monitoring of PM10 as a sustainability issue</li> <li>• Stated that the Scoping Report must incorporate the limits for PM2.5 and NO2 as set out under the EU Ambient Air Quality Directive and fourth Daughter Directives and under World Health Organisation guidelines for health. Stated that given the limits set out in the WHO guidelines are based on evidence of harm to health and are commended in DEFRA's Clean Air Strategy 2019 the Scoping Report should commit to those and work progressively to cut public exposure to fine particulate matter.</li> </ul>	<p>Comments noted and support welcomed.</p> <p>With regards to air quality the baseline data gathered from Defra suggests that the current background concentrations for PM2.5 in the district are well below the 2020 annual mean Air Quality Standard objective for PM2.5. The monitoring indicators will be refined through the Local Plan preparation and SA process up to adoption of the Local Plan. Inclusion of a specific PM2.5 indicator will therefore be subject to further discussion through further iterations of the SA.</p> <p>The review of plans and programmes incorporates Defra's Clean Air Strategy 2019 and the relevant limits and targets. The SA cannot commit the Council to achievement of such limits.</p>
	14 (Transport)	<ul style="list-style-type: none"> <li>• Supported the need to reduce the number of sole occupant journeys to/from work, but also stated that there should be a reduction in car journeys including taking pupils/students to school/university.</li> <li>• Stated that investment into public transport was required to encourage its use and reduce congestion.</li> </ul>	<p>The SA Framework supports the development of sustainable transport measures and reduction in the need to travel regardless of who is making the journey (Objective 13). No changes are required.</p>
	Appendix A (Possible Indicators)	<ul style="list-style-type: none"> <li>• Stated that all Objectives and Sub-objectives should include clear measurable targets that are monitored and use up to date, reliable, accurate and complete data.</li> <li>• Stated that there is currently a lack of commitment to meeting clear targets for the environment, district economy and health.</li> </ul> <p><b>Suggested that with regard to Objective 1 (Air Quality):</b></p> <ul style="list-style-type: none"> <li>• There should be a Sub-objective to the commitment to measure air quality and ensure that accurate and reliable data is obtained across the District in areas at risk from poor air quality due to emissions from traffic.</li> <li>• Stated that Objective 1 should include an indicator for the concentration of PM2.5, in addition to the other indicators already identified.</li> </ul> <p><b>Suggested that with regard to Objective 10 (High Quality Homes):</b></p>	<p>With regards to air quality the baseline data gathered from Defra suggests that the current background concentrations for PM2.5 in the district are well below the 2020 annual mean Air Quality Standard objective for PM2.5. The monitoring indicators will be refined through the Local Plan preparation and SA process up to adoption of the Local Plan. Inclusion of a specific PM2.5 indicator will therefore be subject to further discussion through further iterations of the SA.</p> <p>With regards to Objective 10, energy efficiency is supported through Objective 2. Objective 10 focuses on housing to meet the needs of all communities. The Local Plan itself must consider the balance and mix of housing required based on evidence.</p>



			<ul style="list-style-type: none"> <li>• There should be a sub-objective to promote energy efficiency and require all new housing developments to comply with regulatory and other governmental policy on climate change and energy efficiency.</li> <li>• Highlighted that in Sturry and other agricultural areas there are a number of seasonal workers, who are an important part of the district economy and are often residents for most of the year. Stated that planning policies should require that the accommodation provided for these workers is good quality and well serviced, meeting all relevant statutory and policy requirements, and highlighted that this is not currently included in the scoping report.</li> </ul> <p><b>Suggested that with regard to Objective 13 (Promoting and encouraging sustainable transport):</b></p> <ul style="list-style-type: none"> <li>• There should be a commitment to support the development and implementation of an integrated and sustainable transport strategy which should be developed in partnership with public transport providers, in consultation with residents and all relevant agencies and bodies.</li> </ul>	<p>Objective 13 seeks to measure the effects of the Local Plan's transport implications. It is not the role of the SA to require the Council and other bodies to develop transport strategies, although the implementation of such strategies would support achievement of this objective.</p>
		<p>Appendix B (Plans, Policies and Programmes)</p>	<ul style="list-style-type: none"> <li>• Noted that some plans are under review and are being updated/revised and that some were currently being produced or are out for consultation and have not been included in the Scoping Report.</li> </ul> <p><b>Links to the Local Plan:</b></p> <ul style="list-style-type: none"> <li>• Stated that there should be a commitment to develop, monitor and measure the achievement of clear and measurable targets in compliance with all relevant policies, goals and programmes to take into account the short, medium and long term future, for example in Appendix B:</li> <li>• On action under the Clean Air Strategy it is noted that Appendix B states that the <i>"Local Plan should endeavor to reduce emissions to ensure cleaner air"</i> which is open to making little or no progress.</li> <li>• On sustainable development Appendix B states that <i>'The Local Plan should develop policies and a direction that accounts for sustainable urban development trajectories in line with the aims of this policy'</i>. Clear, measurable targets must be set with timescales reflecting the urgent climate emergency.</li> <li>• On energy efficiency Appendix B states that <i>'The new Local Plan should seek to promote policies that encourage more energy-efficient trajectories in residential and commercial development that are compatible with the directive.'</i> Targets should be set to achieve the implementation of the Directive in the short to medium term.</li> <li>• On biodiversity, Appendix B states that <i>'The new Local Plan should ensure policies address biodiversity impacts and mitigation measures to reduce the impact of development upon the environment.'</i> The Local Plan should specify how the policies on biodiversity must ensure that development does not have an adverse impact on the environment.</li> <li>• Stated that regarding waste targets should be set for waste disposal which do not harm the environment anywhere in the world.</li> <li>• On transport and the South East Route: Key Area Route Study (2018) (Network Rail) there should be a commitment to the development of rail travel and working with Network Rail and rail operators to achieve integrated and sustainable transport.</li> </ul>	<p>Comments noted. The comments relate to the development of the Local Plan and how its effects are monitored. The SA Scoping Report includes a variety of indicators for how the effects against the SA Objectives could be measured. These will be formalised as the Local Plan preparation and SA progresses.</p> <p>Additionally, the comments relate to issues regarding biodiversity and rail travel which the Local Plan should address. These will be considered in plan preparation.</p>

29	The Coal Authority	General Comments	<ul style="list-style-type: none"> <li>No specific comments to make at this stage of the process</li> </ul>	Noted.
30	University of Kent	General Comments	<ul style="list-style-type: none"> <li>Stated that greater emphasis needs to be placed on consultation and openness</li> <li>Suggested that the Council should establish a local consultation forum based on good practice and undertake a number of community consultations to develop Local Plan principles.</li> <li>Suggested that the Council should work with Universities for example the Centre for Sustainable Architecture and the Centre for Health Services Studies at the University of Kent.</li> <li>Stated that public health expertise must be sought regarding the aspects of the plan that can impact health directly</li> <li>Suggested that the impacts of the plan on health could be addressed with a full health impact assessment.</li> </ul>	<p>The comments on consultation will be considered as part of the Local Plan preparation process.</p> <p>The SA Report which supports the Local Plan requires consultation on its findings (in line with the 2004 SEA Regulations).</p> <p>The Council is considering undertaking a separate Health Impact Assessment (HIA) of the Local Plan.</p>
		4 (Air Quality)	<ul style="list-style-type: none"> <li>Stated that the Air Quality section of the scoping report is inadequate as it only references the LAQM regime and annual national limit objectives and does not include Ozone data which is a significant risk to health and limits of which are breached each year in Canterbury.</li> <li>Highlighted that in 2019 Ozone levels breached National 8 hour means on 21 days and exceeded the national hourly limit for informing the public for 7 hours.</li> <li>Stated that there needs to be a distinction between background and roadside measurements and that hourly levels and daily data need to be included to demonstrate patterns of pollution and areas of risk for both long term and short term/cumulative exposure.</li> <li>Advised that the automatic monitoring site at Military Road exceeds 100µg/m<sup>3</sup> an hour near to St Thomas's School and that this level, although within the UK max of 200 µg/m<sup>3</sup> is consistently high enough to cause damage to the lungs of children.</li> <li>Stated that reference to a full mitigation approach is required following the Gladman Appeal Court Case and that this means an approach that development is air quality neutral or improves air quality needs to be incorporated.</li> <li>Stated that greater clarity is needed regarding the impact of the Government's Clean Air Strategy and commitments to reducing pollutants to meet WHO limits.</li> <li>Stated that there should be acknowledgement of the significant health and social care costs and the potential for reducing these through the Local Plan.</li> <li>Suggested that reference could be made to DEFRA/LGA, NICE and PHE guidance on air quality.</li> </ul>	<p>The SA has to report on the likely significant effects of the Local Plan. With regards to air quality the SA Framework includes objective 1 which will allow assessment of whether the plan will have significant effects to be made. With regards to monitoring, the SA relies on the best available data.</p> <p>The review of plans and programmes includes the Government's Clean Air Strategy.</p>
		10 (Population and Human Health)	<ul style="list-style-type: none"> <li>Highlighted that section 10 of the Scoping Report (Population and Human Health) focusses on population issues rather than health and noted that reference is made to deprivation, crime and 2011 census data on reported health and stated that this is very limited.</li> <li>Stated that greater attention needs to be paid to key health issues and addressing inequality of health and access to healthcare and that reference to contributing to reductions in key health problems as identified by PHE is needed.</li> <li>Highlighted that the Local Government Act 2000 allows local authorities in England and Wales to do anything they consider likely to promote the economic, social and environmental well-being of their area unless prohibited elsewhere in legislation and that no reference to this general 'well-being power' has been made in the Scoping Report.</li> </ul>	<p>Comments noted. Agreed that enhanced references are required to capture health under Section 10. Population and Human Health including Public Health England data on health in the City in the 'Local Authority Health Profile'. However, the SA Framework already includes an objective on promoting health (14) so likely significant effects on health can be identified through the SA and no changes are required to the framework.</p>



			<ul style="list-style-type: none"> <li>• Stated that the Local Plan needs to contribute to reductions in health inequalities, measured by years of life lost, noting that there is currently a 9 year gap between the least and most deprived groups in Canterbury, and adding years to life, noting that the Government’s focus is to add 5 years of healthy life for older people.</li> <li>• Stated that the SEA should include a full Health Impact Assessment undertaken by the public health department, noting that the health elements of the previous Local Plan were flawed and not underpinned by a strategic assessment.</li> <li>• Stated that an analysis of access to healthcare, in terms of ability to reach GP services is needed.</li> <li>• Stated that reference was needed to: the NHS Long Term Plan (National) which includes policy developments that should be considered alongside the Local Plan; the Joint Strategic Needs Assessment (Local); and, the Kent and Medway STP Plans (Local).</li> </ul>	<p>A review of the NHS Long Term Plan (National); the Joint Strategic Needs Assessment (Local) will be included in the review of plans and programmes.</p> <p>The Council is considering undertaking a separate Health Impact Assessment (HIA) of the Local Plan.</p>
31	Westbere Parish Council	4 (Air Quality)	<ul style="list-style-type: none"> <li>• Stated that Island Road (A28 from the Sturry Level Crossing to Upstreet) should be factored into the review as it is not currently mentioned. Highlighted that over 1,100 new homes are planned for Broad Oak and Sturry, 500 new homes are planned at a strategic site in Hersden and planning permissions for Hoplands Farm and Old Colliery provide an additional 500 homes and stated that the additional traffic generated by these developments could have serious implications for air quality before and after the construction of any Sturry relief road.</li> </ul>	<p>Comments noted. The SA Scoping Report supports the development of the Local Plan review which will consider the housing allocations that are required and the monitoring arrangements. No change required.</p>
		13 (For Sustainability Appraisal Framework)	<ul style="list-style-type: none"> <li>• Noted that there is a key sustainability objective but no mention of the provision of infrastructure to support new houses. Considered that sustainability is unachievable without guarantees that any new houses will be supported by transport and other key infrastructure required to avoid environmental damage and allow occupation of the housing in a way that reinforces the sustainability objective.</li> <li>• Stated that the Scoping Report is unclear regarding the methodology to be used to determine housing need and the extent to which it will comprise need generated from outside of the District. Stated that there should be a determination not to address such needs until all measures to achieve the sustainability of housing to meet such needs are guaranteed and in place.</li> </ul>	<p>A range of SA Objectives reference the need for infrastructure to support housing including 13 and 14. No changes required.</p> <p>Housing need will be determined through the Local Plan process in accordance with the NPPF and PPG.</p>
		14 (Transport)	<ul style="list-style-type: none"> <li>• Highlighted that there is no mention of possible provision of cycle routes from the east and new housing in Sturry and Hersden into the City and suggested that this could be provided alongside the riverside walk. Stated that the absence of a purpose-built segregated cycle route along this route is a disincentive to cycle into the City and that having this route would support sustainability and air quality objectives.</li> <li>• Stated that it is important to try and factor in a new bypass that could connect Sturry/Fordwich to St Martin’s Hill/Littlebourne that enables traffic to bypass the city centre.</li> </ul>	<p>Encouraging sustainable transport through the promotion of walking and cycling routes is considered a key sustainability issue for the City as supported by SA Objective 13.</p> <p>The SA Scoping Report does not include reference to specific locations. The Local Plan preparation will consider such issues further.</p>

## Options SA Report comments

Ref	Consultee	Consultation Question/Section	Response summary	Response
	Barton Willmore on behalf of Devine Homes	Appraisal of strategic options	Devine Homes support the conclusions that the growth options which include additional homes over and above the standard method housing need generally score well in terms of housing, economy, opportunities for sustainable transport and health, as the opportunities for investment and infrastructure improvements are greater when additional homes are planned for.	The comments on the assessment are noted.
	Barton Willmore on behalf of Devine Homes	Appraisal of strategic options	<p>The outcomes of the Sustainability Appraisal can only be relied upon as a high level sustainability summary for different options presented at this stage. Moving forwards, additional detailed work that considers different levels of growth at Whitstable is necessary to ensure the proposed spatial strategy takes account of the needs of all communities moving forward.</p> <p>In this regard, whilst the overall preferred strategy focuses on upgrades and improvements to Canterbury as a city, it is important in the ongoing SA work that options for the distribution of growth, and resultant benefits and impacts on coastal towns, are considered thoroughly. Suitable growth of the coastal towns, such as Whitstable, will be necessary to ensure there is adequate investment in infrastructure (e.g. secondary school) and there are homes to support local employment opportunities and facilities.</p>	Comment noted. The SA is an iterative process. The assessment of the options involved appraisal of the likely strategic distribution of growth and reasonable alternatives to it. The appraisal has been further refined in light of changes proposed at this stage.
	Barton Willmore on behalf of Devine Homes	Appraisal of strategic options	As part of any assessment of the benefits and impacts of different growth scenarios on Whitstable, this should include an assessment of the sites that are available to accommodate such housing growth. This will allow the council to understand clearly, and the SA to robustly assess, the opportunities available at Whitstable to support its position as a sustainable town in the settlement hierarchy.	Comment noted. A sites assessment has been undertaken. The appraisal of reasonable alternative site options is set out in Section 5 and Appendix G.

<p>Canterbury Climate Action Partnership</p>	<p>Appraisal of strategic options</p>	<p>The costs to all three domains of Canterbury Focus C (Preferred Option) and Canterbury Focus B, far outweigh the benefits. This is not only clear from our assessment of the plans, but it is indicated in the Sustainability Appraisal.</p> <p>it is likely, based on the findings of the Sustainability Appraisal Report, that the Preferred Option (Canterbury Focus C) will have 'significant negative effects on Climate Change (SA Objective 2), Biodiversity (SA Objective 3), Landscape (SA Objective 5) and Land Use (SA Objective 11).</p> <p>Canterbury Focus Option A, which still provides the 9,000 dwellings which meets the minimum LHN figure identified in the HNA 2021, is identified as a more sustainable option within the Sustainability Appraisal, which concludes: 'Overall, the magnitude of the positive and negative effects would be expected to be lower than the Preferred Option.'<sup>8</sup> It is therefore surprising that the Sustainability Appraisal does not recommend the most sustainable option.</p>	<p>Comment noted on the assessment. The Council's reasoning for the selection of the preferred option is outlined.</p>
<p>Canterbury Climate Action Partnership</p>	<p>Appraisal of strategic options</p>	<p>A more detailed review identified a number of significant concerns with the credibility of the Sustainability Appraisals findings. We are especially concerned that the Sustainability Appraisal has no assessment of the Eastern and Western Bypasses. There is no mention of the roads at all, only repeated descriptions of 'significant upgrade to the A28.' We find this absence of appraisal worrisome and urge the City Council not to proceed with such strategies until a full Sustainability Appraisal has been carried out.</p>	<p>Comment noted. The appraisal of the spatial strategy takes into account the proposed Eastern Movement Corridor and South West Canterbury Link Road. Additionally, the relevant policy assessments have also taken these elements of the Local Plan into account.</p>
<p>Canterbury Climate Action Partnership</p>	<p>Appraisal of strategic options</p>	<p>The Preferred Option has significant negative effects on 4 of the 14 criteria, is uncertain about 9 of the criteria, and claims significantly positive effects on 4 criteria (of which 2 are uncertain).</p> <p>This is clearly indicated in the Summaries section of the SA report: 'However, there are also likely a mix of minor positive and significant negative effects on climate change (SA Objective 2), Biodiversity (SA Objective 3), Landscape</p>	<p>Comments on appraisal outcomes noted. The Council's reasoning for the selection of the preferred option is outlined.</p>

(SA Objective 5) and Land Use (SA Objective 11). However, the extent and magnitude of such effects is uncertain at this stage.

This is also clearly indicated in The Appraisal of Strategic Spatial Growth Options, which shows significant negative effects of Options B & C (the options with additional housing and road infrastructure) in relation to greenhouse gas emissions, biodiversity, water quality, sustainable land use and soil quality, resource consumption and waste.

In comparison, Canterbury Focus A only has 1 identified significant negative effect, on Climate, which applies equally to all options, and still retains the significant positive effect on Housing, as well as recognising positive effects on Economy, Sustainable Transport and Health, again with uncertainty.

The SA report contains no mention of a new road, link road or even a bypass (as a noun). Instead, there are repeated mentions of 'Significant upgrading of A28 to enable through-traffic to bypass the city centre'. There are no graphics or maps contained within the SA report depicting this significant upgrading of the A28. Under no circumstances could a brand new link road be considered upgrade of an existing road. This would indicate that the SA – a statutory requirement – is incomplete. A new road would require its own assessment even at Strategy stage. This lack of clarity and absence of information is visible also in Appendix E Appraisal of Strategic Spatial Growth Options, which contains many mentions of 'upgrades to the A28', with not one mention of new link road. However, the Forecast Report, 18 central to the Movement & Transport vision, clearly indicates new bypass roads associated with Options 4 & 5 (which correspond to Preferred Option (Canterbury Focus C) and Option B). These new roads are certainly not upgrades to the A28. They also have significant impacts on multiple sustainability objectives.

Comment noted. The appraisal of the spatial strategy takes into account the proposed Eastern Movement Corridor and South West Canterbury Link Road. Additionally, the relevant policy assessments have also taken these elements of the Local Plan into account.



Canterbury Climate Action Partnership	Appraisal of strategic options	<p>The main arguments utilised to justify the increased significant negative effects identified for the Preferred Option (Canterbury Focus C) hinge on claimed benefits to Economy, Sustainable Transport and Health. However, the argument repeatedly used to promote the preferred option hinges on the scale of the development (14,000-17,000 homes) being able to unlock, through Section 106 agreements, finance to fund wider transport improvements. However, this is based on a number of assumptions not fully articulated in the SA report that raise serious concerns.</p> <p>The SA report also recognises that the Preferred Option 'would conversely also lead to the largest increase in new homes, and although the option would support sustainable transport measures, based on current assumptions, there would be an increase in private vehicle use.'<sup>22</sup></p> <p>So we have a circular and flawed argument that the Preferred Option (Canterbury Focus C) will provide impetus (through Section 106) for investment in wider transports upgrades (new roads), whilst at the same time the significant increase in housing will trigger the requirement for these new roads, and will increase traffic numbers, which will further exacerbate congestion and air quality.</p>	<p>Comments on appraisal outcomes noted. The SA recognises that a larger scale of development will increase traffic but has the potential to support increased scale of investment in sustainable transport measures to address the scale of new development and potentially alleviate any existing deficiencies. This is reflected in the mixed significant positive and significant negative score for transport and accessibility (SA Objective 13).</p>
Canterbury Climate Action Partnership	Appraisal of strategic options	<p>Given the uncertainties identified in the SA, and the multiple significant negative effects identified for Canterbury Focus C, it is difficult to understand on what basis the SA can identify this option as the Preferred Option. The absence of information contained in the SA about the new roads required for Canterbury Focus C undermines the confidence in the assessment.</p>	<p>The identification of Option C being the 'Preferred Option' reflects the decisions made by Canterbury City Council based on the range of evidence base available. The SA reflects the Council's decision at this stage and identifies the Council's reasoning.</p>
Canterbury Climate Action Partnership	Appraisal of strategic options	<p>It is our view that the SA has insufficiently considered the impacts of the new roads associated with Preferred Option (Canterbury Focus C) and is misleading in the consultation regarding the proposed upgrading of the A28, when other plans show new roads, which cannot be accurately described as upgrades to the A28.</p>	<p>Comment noted. The appraisal of the spatial strategy takes into account the proposed Eastern Movement Corridor and South West Canterbury Link Road. Additionally, the relevant policy assessments have also taken these elements of the Local Plan into account.</p>



<p>Gladman</p>	<p>SA approach</p>	<p>Canterbury City Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Canterbury Local Plan's decision-making and scoring should be robust, justified and transparent.</p>	<p>The comments are noted.</p>
<p>Hannah Milton</p>	<p>Strategic options – new roads</p>	<p>The sustainability appraisal conducted is inadequate as it does not treat new roads as being different from "upgrades to A28" therefore, the results of the assessment cannot be taken as face value. At no point can new roads be classified as upgrades. Construction and use of these new roads will have a dramatic affect on carbon emissions and these are measurable. These new roads should be treated as separate and should be mentioned throughout the sustainability assessment. The sustainability assessment does not provide enough information as the majority of responses are unknown. This does not provide the information required to make informed decisions.</p>	<p>Comment noted. The appraisal of the spatial strategy takes into account the proposed Eastern Movement Corridor and South West Canterbury Link Road. Additionally, the relevant policy assessments have also taken these elements of the Local Plan into account.</p>
<p>Judith Aston Associates on behalf of Catesby Estates</p>	<p>Vision</p>	<p>We note the SA highlights the fact there are some possible incompatibilities and uncertainties between the Draft District Vision and Strategic Objectives and the SA objectives, and suggests that most of these uncertainties relate to the need for further development of policies or the reliance on the specific implementation of the Local Plan. This is we fear to be expected when the SA is based on a policy approach that is at present very aspirational, that has not been tested in deliverability and viability terms; and in the case of the strategic growth options is unclear as to quantum and location of future development; albeit the SA acknowledges in section 4.5 that greenfield land will be required to accommodate future growth over the plan period.</p>	<p>Noted. The SA recognises the uncertainties and requirement for implementation of policies to overcome or address specific incompatibilities.</p>



<p>Judith Aston Associates on behalf of Catesby Estates</p>	<p>Appraisal of Strategic growth options</p>	<p>We are somewhat bemused about how the SA can in fact test the strategic growth options given the lack of clarity about what is proposed, and in particular the lack of clarity about what differentiates option C, the preferred option, and option B. Both we note score the same in table NTS3/5.2, and on page 9/ at para 6.1.6 &amp; 6.1.8, the SA suggests that both generate significant positive effects on housing, the economy, transport, and health in recognition of the focus on Canterbury, higher growth levels and investment in transport infrastructure. Whilst the SA goes on to suggest that option B may not deliver the public realm and open space improvements and the redesign of movement within the city as is intended via the preferred option (C) we do not see how the SA can say this when what is proposed under either option is at present so vague. The council need to explain both the difference between the two and why option C was chosen rather than option B.</p>	<p>Comment noted. The SA is an iterative process that reflects the ongoing development of the Local Plan. This necessarily reflects the information available at the time. As the plan progresses there is likely to be more certainty over the overall strategy and elements within it.</p>
<p>Judith Aston Associates on behalf of Catesby Estates</p>	<p>Appraisal of Strategic growth options</p>	<p>Given what is said at paras 5.4.5, 5.4.15, 5.4.21 – 5.4.24, and 5.4.46 of the SA, we do not believe the difference between options B and C is clearly described, or that the justification for the preferred option is clearly defined. This needs to be resolved at the Reg 19 stage if the plan is to accord with para 35 of the NPPF.</p>	<p>Comment noted. The Council's reasoning for the selection and rejection of the alternatives is clearly set out.</p>
<p>Judith Aston Associates on behalf of Catesby Estates</p>	<p>Appraisal of Strategic growth options</p>	<p>This aside we would question why the SA calls into question the deliverability of the higher levels of growth proposed in options B and C, and the suggestion that this could be mitigated by backloading delivery to later in the plan period. Whilst CCC need to identify the sites they believe can deliver the level of growth proposed within options B and C in the next iteration of the plan, and demonstrate these are deliverable through the SHLAA, we do not believe that at this juncture the plan should be looking to back load delivery to the latter part of the plan period. A suitable mix and distribution of sites should ensure there is no impediment to deliver or the council's ability to maintain a rolling 5 year housing land supply.</p>	<p>Comment noted. The SA recognised that housing delivery was below that in recent years as outlined in annual monitoring and therefore it may take time to bring forward sites to meet the higher growth figures and therefore delivery may be later in the plan period. As the plan has progressed and SLAA undertaken further evidence supports the deliverability of the plan's requirements and range of sites.</p>

<p>Judith Aston Associates on behalf of Catesby Estates</p>	<p>Appraisal of Strategic growth options</p>	<p>There is little to differentiate the preferred approach from the alternatives proffered in SA terms. As such there doesn't appear to be any justification for adopting the preferred approach to the following:</p> <p>HNC1 – HNC4 – HNC6 – HNC7 - HNC8 - HNC8 - HNC9 – HNC13 - HNC16 - HNC17 – MTA4 - NE3 - t NE11 - NE12.</p>	<p>As noted in the Draft Option SA Report, given the full range of options, the Council's reasoning for taking forward certain policy approaches was set out in the Draft Options consultation documents.</p>
<p>Janine Jeremiah</p>	<p>Strategic options – Western bypass</p>	<p>I also fail to see a Sustainability Appraisal of the new roads. If this is because they are considered 'an upgrade' I would urge the council to think again, in no way could these 'bypass' roads be considered anything but new roads and as such should be subject to a full Sustainability Appraisal.</p>	<p>Comment noted. The appraisal of the spatial strategy takes into account the proposed Eastern Movement Corridor and South West Canterbury Link Road. Additionally, the relevant policy assessments have also taken these elements of the Local Plan into account.</p>
<p>Kate Green (on behalf of Avison Young)</p>	<p>Housing – strategic options</p>	<p>The SA identifies that a total of six growth options have been appraised within the District, including a Preferred Option at this stage.</p> <p>The SA further states that 'all of the above options meet the minimum Local Housing Need figure identified within the Housing Need Assessment'.</p> <p>We highlight that in December 2020, MHCLG published indicative figures based on the application of the standard method for calculating housing need. For Canterbury City Council, the resultant need is identified as equating to 1,120 per annum. The Council's Housing Needs Assessment (May 2021) further confirms that on analysis</p>	<p>Comment noted. The appraisal was undertaken on the basis of the options as assessed at the time, taking into account supporting information.</p> <p>An appraisal has been undertaken of the draft Local Plan requirement based on the LHN and alternatives (which are above the LHN figure). The LHN figure has informed the spatial strategy.</p>



		<p>of both the demographic and methodological changes to population estimates which inform the projections used to set the baseline for calculating housing need (Step 1 of the formula), no exceptional circumstances for applying an alternative approach to the calculation were identified. The starting point for Canterbury’s housing need is therefore 1,120 per annum.</p> <p>Given these circumstances, we consider it unlikely that all of the above Growth Options would sufficiently plan for Canterbury’s housing needs. Some of the options identify a minimum of 9,000 new homes to be provided to meet Government targets, however, this would only equate to just over 8 years supply of housing (when a housing need figure of 1,120 is assumed, as per the standard method). Whilst the Local Plan period is currently unclear, we envisage that this document will likely seek to span a longer period than 8 years.</p> <p>Given the above, and further to CCC’s clarification regarding the likely Local Plan period, the above growth options are not all considered to be ‘sound’ at this stage.</p>	
Kent County Council	Baseline	<p>PRoW: It is requested that specific mention is made of the PRoW network improvements and investment – references to “walking and cycling” should include the PRoW network and therefore equestrians as well.</p> <p>Paragraph 3.12.24 – the County Council welcomes the inclusion of KCC PRoW ROWIP and requests inclusion that all development must ensure they take the ROWIP into account in order to incorporate PRoW positively and ensure Active Travel connectivity across the whole district. The “Key sustainability Issues” are supported.</p>	The support for the identified Key Sustainability Issues and inclusion of reference to KCC PRoW ROWIP is welcomed. References to walking and cycling would include PRoW. No changes are proposed.
Kent County Council		<p>PRoW: Paragraph 5-5.2 – “support improvements to existing non-designated landscapes” – should include reference to the PRoW network, as historical routes form part of the landscape of the district.</p>	The comments are noted. However, it is not considered that particular reference to the PRoW network is required in the SA Framework. The objectives would support consideration of PRoW in terms of landscape and as part of encouraging active transport.

		<p>Paragraph 13-13.4 - “investment to improve transport infrastructure” should include Active Travel and PRoW links.</p> <p>Paragraph 14 – this is supported and KCC requests that the PRoW network should be included as part of the aim to protect the landscape, visual impact, air quality, which is a significant part of user enjoyment with significant health benefits and the wider natural environment. The network provides substantial opportunities for active travel and outdoor recreation, which can help to address issues associated with health, wellbeing and air quality</p>	
Natural England	Strategic Options – Canterbury Focus B and C	<p>We welcome the mitigation suggested for this option in the SA which suggests that green infrastructure could reduce impacts on biodiversity and landscape and provide opportunities for flood storage (Objectives 3 and 5 and 7). The efforts described here should be strengthened to further mitigate and compensate negative impacts.</p> <ul style="list-style-type: none"> <li>• The mitigation proposed in the SA could go further by considering habitat creation and enhancement with careful consideration regarding priority habitats/species as well as designated sites.</li> </ul>	Comment welcomed. Further mitigation has been identified in the Draft Local Plan Regulation 18 SA Report.
Natural England	Strategic Option – Coastal focus	<p>we have questions regarding the SA’s appraisal of this growth option that need to be addressed in our view. For instance, it is not clear why the coastal focus option is considered to have an equally negative score as the preferred option considering that the coastal focus contains substantially less development pressure on biodiversity. In addition, the SA suggests that there are potential risks of impacts on water quality and coastal waters associated with this option but specific mitigation measures have not been proposed regarding this and it is unclear if this has influenced the overall score for water.</p> <p>We advise that these factors should be further explored and clarified as part of future iterations of the SA and Local Plan options to ensure a coastal focus option is being appraised in a balanced way, especially given its potential landscape benefits of focussing development away from</p>	All options in the Draft Options stage were assessed in a balanced and fair manner, with equal treatment of the options against the SA Framework. It is not clear what an ‘equally negative’ means as the scoring (in terms of positive and negative outcomes) for the Coastal Focus option differs from the Preferred Option C (in the Draft Options SA).



		the Kent Downs AONB compared with other growth options.	
Natural England	SA overall	We recognise that the Sustainability Appraisal (SA) is an iterative process and will be refined as the Local Plan detail is developed. As the SA currently stands, it is our view that further effort needs to be made to ensure that negative impacts from the growth options are avoided as far as possible, either by further exhausting reasonable alternatives and/or by adopting more robust mitigation measures, and by securing overall environmental net gains	A further SA Report supports the Draft Regulation 18 Local Plan. This forms part of the ongoing and iterative approach to SA. A range of mitigation measures are identified in the SA appraisal. Many of these mitigation measures are reflected in the broad range of policy measures identified in the Draft Regulation 18 Local Plan.
Natural England	SA overall – strategic options	The Council appears to be prioritising social and economic considerations over environmental ones as the preferred option has higher negative impacts for environmental factors compared to some alternative growth options despite alternatives having some positive scores for economic and social objectives. For example, Canterbury Focus A has more positive/less negative impacts on biodiversity and landscape while retaining some positive scores for housing, economy and transport. In comparison, the preferred option’s higher housing targets mean that there will be greater investment in local transport and economic opportunities (section 5.4.4 and 5.4.5) but it is expected to have negative impacts (with some mixed positive impacts) on multiple sustainability issues including biodiversity, landscape, land use and water (table 5.2). Furthermore, it would not be unreasonable to assume that these impacts would be higher than alternative scenarios with less development pressure given the greater loss of greenfield sites required (SA section 5.4.10) and the greater environmental impacts associated with an increased population such as from increased road traffic and water consumption.	The SA treats the SA objectives equally and does not assign greater or lesser weight to the environmental, economic and social aspects of sustainability. The preferred spatial strategy has been appraised in the SA Report.
Natural England	SA overall – strategic options	We also question the equal overall score given to lower and higher housing scenarios for Water (negative impacts), given the increased pressures on water quantity	Comment noted. The scores in part reflect the assumptions that “Measures contained in the South East Water and Southern Water WRMP Water Resources Management Plan would be expected to

		and quality that is associated with significantly higher volume of housing.	help ensure that future water resource demands are met.” Additionally, uncertainty was identified for the score, reflecting that the effect may be significant.
Natural England	SA overall – strategic options	We question the SA’s assumption that new development will achieve greenfield runoff rates for all growth scenarios (Appendix E). Although we would welcome this high standard of runoff rates and Local Plan policies that support this, it is our view that this is unrealistic as the current policy proposals do not require this and the mitigation suggested in the SA(Appendix E) suggests that Local Plan policies should seek greenfield rates ‘as far as possible’. The SA methodology should therefore be updated to ensure a realistic appraisal of runoff rates are being considered.	Noted. The reference to the greenfield run off rates has been removed from the assumptions. However, in terms of mitigation the reference to achieving greenfield rates is considered appropriate.
Natural England	SA overall – strategic options mitigation	We support mitigation measures identified for different growth options including for green infrastructure networks as part of mitigating biodiversity and landscape impacts, and the priority for using previously developed land where possible. However, given the above concerns, it is our view that further consideration needs to be given regarding alternative options, increased levels of mitigation and the potential for environmental net gains to ensure a well-balanced option is taken in line with national planning policy.	The support for mitigation measures identified is recognised. As the Local Plan develops and iterations of the of the SA continue, further consideration will be given to mitigation measures.
Natural England	SA objectives and guide questions	We broadly support the key sustainability objectives used to underpin the SA (Table NTS 1). We advise that the following amendments would help strengthen these further to ensure a well-balanced approach to appraising different growth options: <ul style="list-style-type: none"> <li>• Objective 2 should be framed around the aim for achieving a zero carbon future, especially given the timeframe of the Local Plan within the broader context of Government’s net-zero carbon targets and the Council’s own net-zero pledges. Currently, the sub-objectives refer to high levels of energy efficiency and supporting renewables which are welcome but efforts regarding this</li> </ul>	The proposed objective (and sub-objectives) in the SA Framework were consulted on in the preparation of the Scoping Report and comments from NE on these elements were addressed at this stage with amendments made to the SA Objectives where relevant. It is considered that Objective 2 allows for consideration of progress that the policy/proposal could make to reducing carbon emissions and achieving net zero (with the overall UK aim to secure net zero carbon UK – which is to be in place in 2050 which is after the completion of the plan period).



		<p>need to be more ambitious given the Council’s wider aspirations and the urgency of the climate emergency.</p> <ul style="list-style-type: none"> <li>• Sub-objective 3.1 – the support for achieving biodiversity net gain is welcome. As advised elsewhere in our response, BNG should be in addition to following the mitigation hierarchy and good practice (see Appendix 2) and this should be reflected in this sub-objective.</li> <li>• Sub-objective 3.6 - consider moving ‘Carbon Sequestration’ to objective 2 which is concerned with climate change, whereas objective 3 is focused on biodiversity</li> <li>• Objective 7 should reference managing surface water flooding impacts</li> </ul>	<p>It is considered that the overall purpose of Objective 3 ‘To conserve, connect and enhance biodiversity across the District’ would ensure consideration of policy/proposals against the mitigation hierarchy. It is considered that carbon sequestration is suitable for consideration specifically under the biodiversity objective in recognition of the likely ways in which this might be achieved within the Local Plan. However, even though this is a specific sub objective under 3, it does not preclude consideration under SA Objective 2.</p> <p>SA Objective 7 “To reduce the risk of flooding and where appropriate prevent coastal erosion” enables consideration of surface (as well as all other types of) flooding and no changes are proposed.</p>
<p>Natural England</p>	<p>Monitoring indicators</p>	<p>We recognise that the monitoring metrics will be refined as the Local Plan develops. We offer the following advice to help shape these metrics so that they can monitor the effects of the Local Plan options with an appropriate level of detail:</p> <ul style="list-style-type: none"> <li>• Point 3.1 should specifically consider the BNG percentage changes (including for area and linear habitat) that developments commit to and what they achieve in practice</li> <li>• Sub-objective 3 could be more specific regarding ‘changes to green infrastructure’ by considering changes in extent and quality of green infrastructure. Please refer to the upcoming updated version of ANGSt (Accessible Natural Green Space Standards) and Natural England’s Green Infrastructure Standards for guidance on this.</li> <li>• Sub-objective 3’s reference to ‘Number of planning applications which incorporate habitat creation/restoration’ could be expanded to consider enhancement and connectivity (e.g. linear habitats and wildlife corridors as part of wider ecological networks)</li> <li>• The metric suggested for sub-objective 5.1 should be more specific by considering the extent and impact of development within designated landscapes and their settings (e.g. quantity of housing, features at risk of</li> </ul>	<p>The proposed changes to the monitoring indicators will be considered as the plan preparation and SA continues.</p>



		<p>impact), achievement of specific landscape targets (e.g. AONB management plan objectives)</p> <ul style="list-style-type: none"> <li>• Sub objective 6.1 should reference specific pollutant metrics in line with HRA and Stodmarsh nutrient neutrality methodology</li> <li>• Sub objective 6.3 could consider the volume and peak run-off rates targeted and achieved on sites (in line with the CIRIA SUDs manual) in addition to the number of applications with SUDs. Metrics in relation to water efficiency standards in relation to policies relating to this may also be appropriate (Litres per person per day)</li> <li>• Objective 7 – consult with the Environment Agency and Lead Flood Authority to ensure appropriate metrics are being used.</li> </ul>	
Pickett Family Settlement		<p>The Local Plan should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed spatial strategy and site allocations (or any decision not to allocate sites) when considered against 'all reasonable alternatives. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making, and scoring should be robust, justified, and transparent.</p> <p>Our clients therefore recommend that in addition to the current vision, there should be a greater emphasis on sustainable rural development on sites that support the ongoing vitality and viability of rural settlements, like the land at Rentain Road, Chartham</p>	<p>Comment noted. The SA has treated all reasonable alternatives in the same manner as the preferred approach. Reasons for selection and rejection are outlined in the SA.</p> <p>The consideration of changes to the vision will be considered by the Council as it continues developing the Local Plan.</p>
Hilary Rouse-Amadi	Strategic options - bypass	<p>This option mentions an upgrade to the A2 and a 'bypass' which seems to be indicated on the map. Even worse, despite reading supporting documents, I cannot see any Sustainability Appraisal of the roads themselves. This is at best a huge oversight and at worse unlawful. This must be remedied.</p>	<p>Comment noted. The appraisal of the spatial strategy takes into account the proposed Eastern Movement Corridor and South West Canterbury Link Road. Additionally, the relevant policy assessments have also taken these elements of the Local Plan into account.</p>



Joby Carter	Strategic options	<p>The Appraisal of Strategic Spatial Growth Options spotlights significant negative effects of both the preferred option and option B in relation to greenhouse gas emissions, biodiversity, water quality, sustainable land use and soil quality, resource consumption and waste. It is hard to comprehend how the preferred option is being considered when central to the objectives of the Local Plan are sustainability, the protection of biodiversity and de-carbonisation and especially when there are alternative solutions such as Canterbury Focus Option A, and the New Freestanding Settlement, which are identified as more sustainable options within the Sustainability Appraisal, concluding that 'overall, the magnitude of the positive and negative effects would be expected to be lower than the Preferred Option.' If these options still meet the housing target and have similar positive effects without the huge negative effects, it is confusing to me that they should be looked over in favor of the less sustainable option, particularly given the extensive uncertainties identified within the Sustainability Assessment.</p>	<p>The Council's reasoning for the selection and rejection of alternative spatial strategy approaches are set out in the SA.</p>
		<p>I am very concerned that the Sustainability Appraisal has some major flaws. The appraisal seems to have lots of missing information and uncertainty, making it impossible to make considered decisions. For example, the 'Summary Appraisal of Strategic Growth Options' provides information on how each option performs against fourteen identified sustainability objectives and the preferred option is identified as having significant negative effects on four of the fourteen objectives, is flagged with question marks for nine of the objectives, and claims significantly positive effects on four objectives but two of these are uncertain. Especially concerning is the fact that there is no assessment of the eastern and western Bypasses. A 'significant upgrade to the A28' is frequently mentioned, this is misleading and hides the extent of proposed road construction, these 'bypasses' cannot in any way be considered upgrades, they are clearly new roads and as such will require a full Sustainability Appraisal. Even if a 'modal shift' was achieved, and even with lower emissions and carbon reviews, the major housing and road</p>	<p>The appraisal of the spatial strategy takes into account the proposed Eastern Movement Corridor and South West Canterbury Link Road. Additionally, the relevant policy assessments have also taken these elements of the Local Plan into account.</p>



			<p>developments included in the preferred option and option B are not compatible with the identified need to de-carbonise transport and buildings. The Sustainability Appraisal clearly states that the Preferred Option ‘would conversely also lead to the largest increase in new homes, and although the option would support sustainable transport measures, based on current assumptions, there would be an increase in private vehicle use.’ I do not believe that the Sustainability Appraisal has sufficiently considered the impacts of the new roads associated with preferred option and is misleading in the consultation regarding the proposed upgrading of the A28. The preferred option cannot be considered sustainable and is in direct opposition to the objectives laid out in the vision of the Local Plan.</p>	
Judith Aston Associates on behalf of Redrow Homes	Vision	<p>We note the SA highlights the fact there are some possible incompatibilities and uncertainties between the Draft District Vision and Strategic Objectives and the SA objectives and suggests that most of these uncertainties relate to the need for further development of policies or the reliance on the specific implementation of the Local Plan. This is we fear to be expected when the SA is based on a policy approach that is at present very aspirational, that has not been tested in deliverability and viability terms; and in the case of the strategic growth options is unclear as to quantum and location of future development; albeit the SA acknowledges in section 4.5 that greenfield land will be required to accommodate future growth over the plan period</p>	<p>Comment noted. The SA is an iterative process that reflects the ongoing development of the Local Plan. This necessarily reflects the information available at the time. Therefore, it is not unusual to have a range of uncertainties in an assessment. In some cases it is likely that these uncertainties will remain as often such issues cannot be fully addressed until a planning application is determined. In terms of viability Council’s usually prepare evidence as the plan progress and options firm up. A viability study has been produced alongside the draft Local Plan.</p>	
Judith Aston Associates on behalf of Catesby Estates	Appraisal of Strategic growth options	<p>We are somewhat bemused about how the SA can in fact test the strategic growth options given the lack of clarity about what is proposed, and in particular the lack of clarity about what differentiates option C, the preferred option, and option B. Both we note score the same in table NTS3/ 5.2, and on page 9/ at para 6.1.6 &amp; 6.1.8, the SA suggests that both generate significant positive effects on housing, the economy, transport, and health in recognition of the focus on Canterbury, higher growth levels and investment in transport infrastructure. Whilst the SA goes on to</p>	<p>Comment noted. The SA is an iterative process that reflects the ongoing development of the Local Plan. This necessarily reflects the information available at the time. As the plan progresses there is likely to be more certainty over the overall strategy and elements within it.</p>	



			<p>suggest that option B may not deliver the public realm and open space improvements and the redesign of movement within the city as is intended via the preferred option (C) we do not see how the SA can say this when what is proposed under either option is at present so vague. The council need to explain both the difference between the two and why option C was chosen rather than option B.</p>	
Judith Aston Associates on behalf of Catesby Estates	Appraisal of Strategic growth options	Given what is said at paras 5.4.5, 5.4.15, 5.4.21 – 5.4.24, and 5.4.46 of the SA, we do not believe the difference between options B and C is clearly described, or that the justification for the preferred option is clearly defined. This needs to be resolved at the Reg 19 stage if the plan is to accord with para 35 of the NPPF.	Comment noted. The Council's reasoning for the selection and rejection of the alternatives is clearly set out.	
Judith Aston Associates on behalf of Catesby Estates	Appraisal of Strategic growth options	This aside we would question why the SA calls into question the deliverability of the higher levels of growth proposed in options B and C, and the suggestion that this could be mitigated by backloading delivery to later in the plan period. Whilst CCC need to identify the sites they believe can deliver the level of growth proposed within options B and C in the next iteration of the plan, and demonstrate these are deliverable through the SHLAA, we do not believe that at this juncture the plan should be looking to back load delivery to the latter part of the plan period. A suitable mix and distribution of sites should ensure there is no impediment to deliver or the council's ability to maintain a rolling 5 year housing land supply.	Comment noted. The SA recognised that housing delivery was below that in recent years as outlined in annual monitoring and therefore it may take time to bring forward sites to meet the higher growth figures and therefore delivery may be later in the plan period. As the plan has progressed and SLAA undertaken further evidence supports the deliverability of the plan's requirements and range of sites.	
Judith Aston Associates on behalf of Redrow Homes	Non-Strategic options	<p>There is little to differentiate the preferred approach from the alternatives proffered in SA terms. As such there doesn't appear to be any justification for adopting the preferred approach to the following:</p> <p>HNC1 – HNC6 – HNC7 - HNC8 - HNC9 – HNC16 -</p>	As noted in the Draft Option SA Report, given the full range of options, the Council's reasoning for taking forward certain policy approaches was set out in the Draft Options consultation documents.	

		HNC17 – MTA4 - NE3 - t NE12.	
Rowlandson	Strategic Option	<p>Western bypass: The plans are quite simply appalling. The rough graphics suggest a new road running parallel to the Rough Common Road, through the designated ‘green gap’ separating Canterbury from Rough Common, through woodland, farmland, orchards, and (so it appears) through Kent College grounds, depositing traffic with nowhere to go opposite the notoriously jammed Giles Lane entrance. This is a back-of-the-envelope wish-list with no viability whatsoever. The very confusing traffic-flow models do not even show any benefits. The destruction to protected green spaces would be horrendous. And all for nothing. I am astonished that anyone could take it seriously, even those in favour of road-building. The plans (such as they are) are destructive and ineffective.</p> <p>This, in my opinion, is why it has not been appraised in the SA, as the inadequacy of the plans would be immediately revealed. I also feel this is why the bypass is not indicated on the Have your Say pages aside from the very sketchy graphic. If the public really could see the plans they would doubtless reject them.</p>	<p>Comment noted. The appraisal of the spatial strategy takes into account the proposed Eastern Movement Corridor and South West Canterbury Link Road. Additionally, the relevant policy assessments have also taken these elements of the Local Plan into account.</p>
Stephen Peckham	Baseline - Health	<p>The JSNA should be a key local/regional policy document. National policy documents on issues such as planning and health published by the NHS, Public Health England and the National Institute for Clinical Excellence should also be referred to.</p>	<p>Comment noted. The JSNA has been added to the review of plans and programmes.</p>
Stephen Peckham	strategic options - Health	<p>Currently the proposed preferred option will fail to meet this policy goal. In terms of promoting health the only objective is to “Promote healthy lifestyles including through sport and physical activity” (14.5) However, option C removes access to open space and there is an odd reference on p59 of the Sustainability Appraisal to “Improving the deprivation within the District “ As a result it</p>	<p>The assessment identified a mix of significant positive and minor negative effects for Option C. The preferred spatial strategy in the Draft Regulation 18 Local Plan also identifies a mix of effects. The Council undertook a Health Impact Assessment for the options consultation and this was made available as part of the associated evidence base. A Health Impact Assessment will be</p>



		<p>is bizarre that the Sustainability Appraisal gives option C a positive result for health. Any objective and real assessment of the overall impact is clearly negative. The mitigation factors focus on improving access to sports facilities and countryside and improving access to and gaining developer contributions for healthcare facilities. Negative aspects of environmental degradation are completely ignored as is the impact of option C on limiting equality of access to local countryside.</p> <p>The current sustainability assessment on population health is inadequate to make any assessment of how options will affect population health. The council need to undertake a more thorough health impact assessment of their options before identifying a preferred option.</p>	<p>undertaken, and published, for the draft Local Plan as well.</p>
University of Kent	Vision	<p>CCC's Sustainability Appraisal (SA, May 2021) has found that the Draft Vision is broadly supportive of the identified objectives although some possible incompatibility and uncertainties have been identified. These largely relate to the need for the further development of policies or the reliance on the specific implementation of the Local Plan. The University note these conclusions and will continue to monitor the development of the Plan in relation to the SA as the Plan progress through the plan-making process.</p>	<p>Comment noted.</p>
University of Kent	Strategic options	<p>EThe SA further states that 'all of the above options meet the minimum Local Housing Need figure identified within the Housing Need Assessment'. We consider it unlikely that all of the above Growth Options would sufficiently plan for Canterbury's housing needs. Some of the options identify a minimum of 9,000 new homes to be provided to meet Government targets, however, this would only equate to just over 8 years supply of housing (when a housing need figure of 1,120 is assumed, as per the standard method). Whilst the Local Plan period is currently unclear, we envisage that this document will likely seek to span a longer period than 8 years.</p>	<p>Comment noted. An appraisal has been undertaken of the draft Local Plan requirement based on the LHN and alternatives (which are above the LHN figure). The LHN figure has informed the spatial strategy.</p>



Wedgewood  
Land &  
Investments Ltd

The Local Plan should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed spatial strategy and site allocations (or any decision not to allocate sites) when considered against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making, and scoring should be robust, justified, and transparent.

Wedgewood therefore recommend that in addition to the current vision, there should be a greater emphasis on sustainable rural development on sites that can contribute to the ongoing vitality and viability of important rural settlements, like the land to the west of Rattington Street in Chartham.

Comment noted. The SA has treated all reasonable alternatives in the same manner as the preferred approach. Reasons for selection and rejection are outlined in the SA.

The consideration of changes to the vision will be considered by the Council as it continues developing the Local Plan.

